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Transcript of Howan Kwok

Date: April 1, 2021
Case: Cheng -v- Guo

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Transcript of Howan Kwok
Conducted on April 1, 2021

1 (1 to 4)

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3 -----x
4 LOGAN CHENG f/k/a Shuiyan Cheng,
5 Plaintiff,
6 -v- 1:20-cv-05678-KPF
7 WENGUI GUO,
8 Defendant.

11
12 REMOTE DEPOSITION OF HOWAN KWOK
13 April 1, 2021

15 Reported by:
16 MARY F. BOWMAN, RPR, CRR
17 JOB NO. 360803

23
24
25

1 APPEARANCES: (BY VIDEOCONFERENCE)
2
3 RANDAZZA LEGAL GROUP
4 Attorneys for Plaintiff
5 2764 Lake Sahara Drive, Suite 109
6 Las Vegas, NV 89117
7 BY: JAY MARSHALL WOLMAN, ESQ.
8 MARC RANDAZZA, ESQ.

11 SCHULMAN BHATTACHARYA, LLC
12 Attorneys for Defendant
13 7500 Old Georgetown Rd, Suite 901
14 Bethesda, Maryland 20814
15 BY: JEFFREY GAVENMAN, ESQ.

17
18 Also Present:
19 Juliet Hooper, Document Technician
20

23
24
25

1
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April 1, 2021

8 Remote deposition of HOWAN KWOK, held
9 before Mary F. Bowman, a Registered Professional
10 Reporter, Certified Realtime Reporter, and Notary
11 Public of the States of New York and New Jersey.

1
2
3 IT IS HEREBY STIPULATED AND
4 AGREED, by and between the attorneys for
5 the respective parties herein, that
6 filing and sealing be and the same are
7 hereby waived.

8 IT IS FURTHER STIPULATED AND
9 AGREED that all objections, except as to
10 the form of the question, shall be
11 reserved to the time of the trial.

13 IT IS FURTHER STIPULATED AND
14 AGREED that the within deposition may be
15 sworn to and signed before any officer
16 authorized to administer an oath, with
17 the same force and effect as if signed
18 and sworn to before the Court.

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Transcript of Howan Kwok

2 (5 to 8)

Conducted on April 1, 2021

1 THE REPORTER: Will counsel
 2 please stipulate that in lieu of
 3 formally swearing in the interpreter,
 4 the reporter will instead ask the
 5 interpreter to acknowledge that their
 6 interpretation will be true under the
 7 penalties of perjury, that counsel will
 8 not object to the admissibility of the
 9 transcript based on proceeding in this
 10 way.

11 MR. GAVENMAN: Yes.

12 MR. WOLMAN: Yes.

13 THE REPORTER: Do you solemnly swear
 14 or affirm that the interpretation you will
 15 give in this deposition will be from English
 16 to Mandarin and from Mandarin to English to
 17 the best of your ability?

18 THE INTERPRETER: I do.

19 - - - -

20
 21
 22
 23
 24
 25

5

1 answer, as a general proposition, you are required
 2 to nonetheless answer my questions. And your
 3 answers are going to need to be in words, rather
 4 than in nods or sounds in order to ensure that we
 5 have an accurate transcript of this proceeding.

6 If at any time you need to take a
 7 break, please let me know and we will do so. But
 8 I would ask that you answer any pending question
 9 unless it is to confer with your counsel regarding
 10 a claim of privilege.

11 And I would ask that if you don't
 12 understand a question, please don't guess. I
 13 would be happy to try to rephrase it.

14 Do you understand that?

15 A. Yes, I understand.

16 Q. Have you ever had your deposition
 17 taken previously?

18 A. Yes.

19 Q. How many times?

20 A. I can't recall.

21 Q. Is it more than five?

22 A. Possible.

23 Q. Were those in proceedings in the
 24 United States?

25 A. Yes.

6
 1 HOWAN KWOK,
 2 called as a witness by the parties,
 3 having been duly sworn, testified as
 4 follows:

5 EXAMINATION BY

6 MR. WOLMAN:

7 Q. Good morning, Mr. Kwok.

8 A. Good morning, sir.

9 Q. My name is Jay Wolman and I represent
 10 Mr. Logan Cheng who is a plaintiff in a suit
 11 against you in the U.S. District Court for the
 12 Southern District of New York.

13 We have with us today an
 14 interpreter who will be interpreting my questions
 15 to you and your answers back to us. And because
 16 of the number of people, we can't talk over each
 17 other.

18 And even if you understand some
 19 English, please make sure that you hear the
 20 interpreted question and answer in your native
 21 language in order to ensure that we get the most
 22 accurate discourse between us.

23 And you have present today your
 24 lawyer, Mr. Gavenman, who may make certain
 25 objections. But unless he directs you not to

7
 1 answer, as a general proposition, you are required
 2 to nonetheless answer my questions. And your
 3 answers are going to need to be in words, rather
 4 than in nods or sounds in order to ensure that we
 5 have an accurate transcript of this proceeding.

6 If at any time you need to take a
 7 break, please let me know and we will do so. But
 8 I would ask that you answer any pending question
 9 unless it is to confer with your counsel regarding
 10 a claim of privilege.

11 And I would ask that if you don't
 12 understand a question, please don't guess. I
 13 would be happy to try to rephrase it.

14 Do you understand that?

15 A. Yes, I understand.

16 Q. Have you ever had your deposition
 17 taken previously?

18 A. Yes.

19 Q. How many times?

20 A. I can't recall.

21 Q. Is it more than five?

22 A. Possible.

23 Q. Were those in proceedings in the
 24 United States?

25 A. Yes.

8
 1 Q. Are there any particular cases you can
 2 recall in which your deposition was taken?

3 A. Pacific Alliance. And Guo Baosheng
 4 defamation case and Ha Yeliang defamation case.

5 Q. Before we proceed, I want to clarify
 6 one thing, you said before we proceeded that your
 7 name is Howan Kwok. Is that correct?

8 A. Yes.

9 Q. Can I hear you pronounce your last
 10 name so I can make sure I address you properly and
 11 pronounce it properly.

12 A. K-W-O-K.

13 Q. Can I hear you say your last name?

14 A. K-W-O-K-- O-K, H-O-W-A-N, that is my
 15 name.

16 Q. I understand. I'm not asking that
 17 question. I want to hear you say your last name.

18 A. Kwok.

19 Q. Kwok. Thank you.

20 Now, this lawsuit has the spelling of
 21 your name as W-E-N-G-U-I, G-U-O. Are you familiar
 22 with that?

23 MR. GAVENMAN: Objection to form.

24 Can you clarify which lawsuit we are talking
 25 about?

Transcript of Howan Kwok

3 (9 to 12)

Conducted on April 1, 2021

	9		11
1	MR. WOLMAN: I said this lawsuit.	1	MR. GAVENMAN: There is no reason to
2	MR. GAVENMAN: OK.	2	talk about the immigration status, right?
3	A. Yes.	3	You can ask this question, but if you go any
4	Q. Is that a name you use?	4	further about immigration status --
5	A. Yes.	5	(Simultaneous crosstalk)
6	Q. Why do you use that name?	6	Q. I will repeat, what is your
7	A. Now, it is because K-W-O-K and G-U-O,	7	immigration status, Mr. Kwok?
8	they were actually the pronunciation for the same	8	A. I am in the application -- in the
9	character, but one is the pronunciation from	9	middle of the application of political asylum.
10	mainland China and one is the pronunciation in	10	Q. And what is the spelling of your name
11	Hong Kong.	11	that you used on your asylum application?
12	Q. What about the given name?	12	A. H-O-W-A-N, K-W-O-K.
13	A. It is because when I went to Hong Kong	13	Q. Before you mentioned a social security
14	and because the name has been duplicated in some	14	card with a different spelling, is that correct?
15	way, so I changed the given name.	15	A. No, it's still the same name,
16	Q. What is on -- strike that.	16	H-O-W-A-N, K-W-O-K.
17	Do you have a form of identification	17	Q. I thought I heard you mention a
18	issued by a government, either federally or state	18	spelling H-A-Y-U-N, is that correct?
19	in the United States?	19	A. No, I have been saying all the time
20	A. Yes.	20	that it's H-O-W-A-N.
21	Q. And what is that identification?	21	Q. Have you ever used the spelling
22	A. Howan, H-O-W-A-N.	22	H-A-O-Y-U-N for your given name?
23	Q. Let me ask again. What is the form of	23	A. No.
24	identification?	24	Q. Now, you mentioned a social security
25	A. Social security card.	25	card. Are you employed?
	10		12
1	Q. Do you have a driver's license issued	1	A. I have always been the consultant for
2	by the State of New York?	2	a lot of companies. And my current employment is
3	A. No.	3	the -- I am in the broadcasting and to take down
4	Q. Do you have a form of alien	4	the Chinese Communist Party. It is a broadcasting
5	identification issued by the United States	5	revolution.
6	Department of Homeland Security?	6	Q. How much do you get paid for that?
7	A. No.	7	MR. GAVENMAN: On advice of counsel,
8	Q. What is your immigration status to the	8	Mr. Guo declines to respond to the question
9	United States?	9	invoking his rights under the Fifth
10	MR. GAVENMAN: Objection. Jay, why	10	Amendment of the U.S. Constitution.
11	is it relevant in any way what his	11	He can't answer that question.
12	immigration status is? Where are you	12	Q. Mr. Kwok, are you taking your
13	going -- I mean, this is really not a	13	attorney's advice and refusing to answer that
14	particularly appropriate line of	14	question?
15	questioning.	15	A. Yes.
16	I'm not going to necessarily	16	Q. Are you presently being prosecuted
17	direct him not to answer this, but I	17	for -- under -- for any crime by any United
18	don't know why we are going down the	18	States, state or the federal government?
19	pathway about what his immigration	19	MR. GAVENMAN: On advice of Mr. Guo's
20	status is.	20	counsel, Mr. Guo declines to respond to the
21	MR. WOLMAN: To determine whether or	21	question invoking his rights under the Fifth
22	not he has an identification card.	22	Amendment of the U.S. Constitution.
23	MR. GAVENMAN: OK, so we can --	23	MR. WOLMAN: Jeff, he can't refuse
24	MR. WOLMAN: And no speaking	24	whether or not there is a prosecution.
25	objection, Counsel.	25	Either the government is prosecuting or not.

Transcript of Howan Kwok

4 (13 to 16)

Conducted on April 1, 2021

	13		15
1	MR. GAVENMAN: I can and he did.	1	testimony before court, out of court in any other
2	It's --	2	case?
3	MR. WOLMAN: I mean, there is no	3	A. I don't recall.
4	self-incrimination possible to acknowledge	4	Q. I should ask you, do you have any
5	that there is a case.	5	medical conditions that might impair your ability
6	MR. GAVENMAN: Well, any	6	to understand any questions or give truthful and
7	understanding of the status is also	7	accurate answers today?
8	privileged by Miles -- by Mr. Kwok. So he	8	A. No.
9	can decline on attorney/client grounds and	9	Q. Have you ingested any substance
10	Fifth Amendment grounds about what's	10	including alcohol or prescription narcotics that
11	happening in that particular arena. So he	11	might impair your ability to answer truthfully or
12	cannot answer that question in either	12	accurately today?
13	capacity.	13	A. No.
14	THE INTERPRETER: Do you need this to	14	Q. In the last ten years, have you been
15	be interpreted or is that between the	15	convicted of any crime involving dishonesty?
16	counsel?	16	A. No.
17	MR. WOLMAN: That's between the	17	Q. In the last five years, have you been
18	counsel.	18	arrested or charged with a crime involving
19	Q. Mr. Kwok, are you taking your	19	dishonesty?
20	attorney's advice and refusing to answer my	20	A. No.
21	question about being prosecuted by any state?	21	Q. Are you familiar with the plaintiff in
22	A. Yes.	22	this action, Logan Cheng?
23	Q. Have you been indicted by any state in	23	A. I met him once.
24	the United States?	24	Q. Are you aware that you filed a lawsuit
25	A. No.	25	against him in the state of Nevada?
	14		16
1	Q. Have you been indicted by a grand jury	1	A. Yes.
2	of the United States?	2	Q. Do you know why that lawsuit was filed
3	A. No.	3	with your name as W-E-N-G-U-I, G-U-O rather than
4	Q. Has any search warrant been executed	4	H-O-W-A-N, K-W-O-K?
5	on you in the last year?	5	MR. GAVENMAN: I'll just caution
6	A. No.	6	Mr. Kwok not to reveal any attorney/client
7	Q. Are there any active arrest warrants	7	communications when answering this question.
8	for you in the United States?	8	That is counsel's recommendation.
9	A. No.	9	Just to clarify, my
10	Q. You testified earlier that you gave	10	recommendation is if you can answer
11	deposition testimony in at least five cases. Have	11	without revealing attorney/client
12	you ever testified in court in the United States?	12	communication, you're free to answer,
13	MR. GAVENMAN: Objection to form.	13	but if that understanding comes from
14	A. Yes.	14	attorney/client communication, you
15	Q. And how many times?	15	should not.
16	A. Around three or four times.	16	A. Well, I am answering the question that
17	Q. In what cases?	17	17 is why would I use a different name is because it
18	A. Well, I was the witness in the	18	18 was recommended by a previous lawyer, lawyer in
19	courtroom for the cases of Guo Baosheng defamation	19	19 the past.
20	case and Ha Yieliang defamation and also Pacific	20	Q. Did you review the complaint in that
21	Alliance.	21	case before it was filed?
22	Q. Have you testified in court in any	22	MR. GAVENMAN: Just asking for a
23	other cases in the United States?	23	clarification, are you talking about the
24	A. I don't recall clearly.	24	case you referred to a previous case and not
25	Q. And have you given deposition	25	the Nevada case? Or you are talking about

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5 (17 to 20)

Conducted on April 1, 2021

	17		19
1	the Nevada case?	1	screen.
2	MR. WOLMAN: The Nevada case we are	2	(Exhibit 1, Amended Notice of
3	discussing right now.	3	Deposition marked for identification, as
4	A. They have used translator briefly to	4	of this date.)
5	go through that complaint to me, you know, once.	5	Q. Mr. Kwok, to the best of your
6	I can't read it myself because I don't know how to	6	knowledge and understanding, is your presence here
7	read English.	7	today pursuant to the amended notice of deposition
8	Q. Are you familiar with the English	8	shown as Exhibit 1?
9	alphabet?	9	A. Yes.
10	A. I know the alphabet.	10	Q. Thank you. You can close that.
11	Q. And are you able to tell the	11	Mr. Kwok, what did you do to
12	difference between the letters "G-U-O" and	12	prepare for the deposition today? I don't need to
13	"K-W-O-K"?	13	know what you and your attorney discussed.
14	A. Yes.	14	MR. GAVENMAN: I appreciate
15	Q. And did you see the English language	15	Mr. Wolman's clarification, but please don't
16	version of the Nevada complaint before it was	16	reveal any attorney/client communications.
17	filed?	17	You can just say generally what
18	THE INTERPRETER: Counsel, you're	18	we did.
19	asking before he filed the complaint, did he	19	MR. WOLMAN: I didn't say -- wait,
20	read the complaint?	20	stop. Please don't change my question. I
21	MR. WOLMAN: Did he see the English	21	did not say "Generally."
22	language version of the complaint before it	22	MR. GAVENMAN: OK.
23	was filed in Nevada.	23	THE INTERPRETER: I still need to
24	A. Yes.	24	interpret what counsel just has said. OK.
25	Q. Did you notice at any time that it did	25	A. Yes. And then my --
	18		20
1	not contain your name with the spelling K-W-O-K?	1	THE INTERPRETER: Sorry, the witness
2	MR. GAVENMAN: Objection to form.	2	just said something and he stopped, so I am
3	A. I don't remember.	3	just clarifying with him what was he saying.
4	Q. Did you observe that it contains the	4	A. I just say yes.
5	name spelled G-U-O throughout the complaint in	5	Q. That was not a yes-or-no question.
6	Nevada?	6	What did you do to prepare for today?
7	MR. GAVENMAN: Objection to form.	7	MR. GAVENMAN: Again, I'll caution
8	A. No.	8	you not to reveal any attorney/client
9	Q. What is the name Miles Kwok?	9	communications in this answer.
10	A. Well, because any Chinese person	10	A. I have done some normal preparation
11	operating or living in the western world, then we	11	before appearing to court, but I can't tell you
12	would have an English name adding the last name,	12	any more because that would reveal what had been
13	and that's Kwok.	13	discussed between my counsel and myself.
14	Q. Thank you.	14	Q. Did you review any documents to
15	MR. WOLMAN: Now, Ms. Hooper, I sent	15	prepare for today's deposition?
16	you a document starting 001.	16	A. No.
17	TECHNICIAN: Yes, Counsel, would you	17	Q. Did you talk to anybody other than
18	like that on the screen?	18	your attorney about this deposition?
19	MR. WOLMAN: Yes, please.	19	A. No.
20	TECHNICIAN: Would you like that	20	Q. Does anybody other than the people on
21	marked as an exhibit?	21	this screen know that you are being deposed today?
22	MR. WOLMAN: Let's mark that as	22	A. I don't know.
23	Exhibit 1.	23	Q. Have you told anybody that you are
24	TECHNICIAN: One moment please.	24	being deposed today?
25	OK, the document is on the	25	A. I haven't told anyone specifically,

Transcript of Howan Kwok

6 (21 to 24)

Conducted on April 1, 2021

	21		23
1	but then the thing is that every day, I will be	1	But now that you scroll down, I can see my
2	doing my broadcasting and during which I said that	2	signature. I don't know whether I have seen this
3	I will be being a witness, but I did not	3	document before or not.
4	specifically say what case.	4	Q. Is that your signature?
5	Q. And in what broadcast did you say you	5	A. Yes.
6	would be a witness?	6	Q. Do you remember --
7	A. So it was at the 9:30 GTV program.	7	A. It is my signature, Guo Wengui.
8	Q. This morning?	8	Q. Are you familiar with somebody named
9	A. Yes.	9	Daniel Podhaskie?
10	Q. From where did you broadcast that?	10	A. Yes.
11	A. It was not a broadcasting. It was	11	Q. Where were you on December 10, 2020?
12	really just like making a video. It's like those	12	MR. GAVENMAN: Objection to form.
13	one-minute short videos and -- so nine minutes of	13	A. I can't remember.
14	video. But then after nine minutes, we would just	14	Q. Did you meet with Mr. Podhaskie on
15	do one-minute uploading. So it was like that kind	15	December 10, 2020?
16	of a video making.	16	A. I don't recall.
17	Q. You said "we." Who is we?	17	Q. How do you recall the name
18	A. I did not say "we." I said I.	18	Mr. Podhaskie?
19	Q. Did anybody assist you with that	19	A. Daniel Podhaskie, he is working
20	recording and uploading?	20	lawyer. He's a lawyer working in the work --
21	A. No.	21	working.
22	Q. From where did you make that recording	22	Q. Is Mr. Podhaskie your lawyer?
23	and uploading?	23	MR. GAVENMAN: Objection to form.
24	A. It was the same chair and the same	24	A. He's working for New York Golden
25	desk and same background. It's just right here.	25	Spring.
	22		24
1	Q. Where is that?	1	Q. Thank you.
2	A. It was 1801 Sherry Netherland. 18th	2	Do you have any reason to believe that
3	floor.	3	this is not your signature as executed on
4	Q. Is that your residence?	4	December 10, 2020?
5	A. I live here. It's not mine, but I	5	A. No.
6	live here.	6	Q. Did you understand this document
7	MR. WOLMAN: I'm going to show you --	7	before you signed it?
8	Ms. Hooper, a document that begins with 007.	8	MR. GAVENMAN: Objection to form.
9	TECHNICIAN: Yes, one moment please.	9	A. Yes.
10	Would you like this marked as	10	Q. How were you able to understand it?
11	Exhibit 2?	11	A. Because every time he would get a
12	MR. WOLMAN: Yes, please. The	12	translator translating the documents before I
13	document is on the screen.	13	understand it, before I sign it.
14	(Exhibit 2, Defendant Wengui	14	Q. And what is Golden Spring New York?
15	Guo's Verified Statement Pursuant to	15	A. It's a company.
16	Local Civil Rule 26.1 marked for	16	Q. And what is your relationship to that
17	identification, as of this date.)	17	company?
18	Q. Mr. Guo, this says this document is	18	MR. GAVENMAN: On advice of Mr. Guo's
19	your verified statement pursuant to Local Civil	19	personal counsel, Mr. Guo declines to
20	Rule 26.1.	20	respond to the question invoking his rights
21	Have you seen this document	21	under the Fifth Amendment of the U.S.
22	before?	22	Constitution.
23	MR. WOLMAN: And please scroll down.	23	Q. Are you accepting your attorney's
24	A. So, you see, I can only recognize	24	advice and refusing to answer the question?
25	Wengui Guo, my name, and some Arabic numerics.	25	A. Yes.

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7 (25 to 28)

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25

27

1 Q. On December 10, did you sign this
 2 document in the presence of Mr. Podhaskie, a
 3 Golden Spring attorney?

4 MR. GAVENMAN: I'm going to caution
 5 you not to reveal any attorney/client
 6 communications in this answer.

7 Q. Before we proceed, I need to establish
 8 something.

9 You testified that Mr. Podhaskie was
 10 the lawyer for Golden Spring, New York. Is he
 11 your lawyer as well?

12 MR. GAVENMAN: Objection to form.

13 A. Yes.

14 Q. Do you have a representation agreement
 15 with Mr. Podhaskie?

16 MR. GAVENMAN: Objection to form.

17 A. **This is between myself and my counsel,
 18 so I cannot answer that.**

19 Q. You can answer whether or not you have
 20 a representation agreement.

21 A. I don't know.

22 Q. How do you know Mr. Podhaskie
 23 represents you personally and not just Golden
 24 Spring, New York?

25 A. **Because he's representing me all**

26 1 **along.**

2 Q. When did you first retain
 3 Mr. Podhaskie?

4 A. I don't recall.

5 Q. For what purposes does Mr. Podhaskie
 6 represent you individually?

7 MR. GAVENMAN: Because the word
 8 "purpose" is in there, I have to caution you
 9 not to reveal any attorney/client
 10 communications in this answer.

11 A. **My answer is that he's a lawyer.**

12 Q. Do you have him on a general retainer
 13 for any and all purposes?

14 A. **I don't understand when you say
 15 general, what does it mean general or not general?**

16 I don't understand.

17 Q. Let me try to clarify.

18 Mr. Gavenman represents you as a
 19 defendant in this case. For what purposes does
 20 Mr. Podhaskie represent you?

21 MR. GAVENMAN: I'm going to object to
 22 form and I'm going to again caution you not
 23 to reveal any attorney/client communications
 24 in this answer.

25 A. **That's right. That's why I don't know**

1 **how to answer your question. I don't really know
 2 how to. And I don't really want to answer
 3 irresponsibly so that to be irrelevant to this
 4 case.**

5 Q. Without telling me the content of any
 6 conversations you had with Mr. Podhaskie, in what
 7 capacity does he represent you?

8 MR. GAVENMAN: Objection to form.

9 A. **I cannot -- I am -- I am unable to
 10 answer this question. I cannot answer this
 11 question.**

12 Q. Does Mr. Podhaskie represent you in
 13 any lawsuit?

14 MR. GAVENMAN: Objection to form.

15 A. **I don't recall.**

16 Q. Does Mr. Podhaskie represent you for
 17 any matter in which you have claimed the privilege
 18 under the Fifth Amendment to the U.S.

19 Constitution?

20 MR. GAVENMAN: Objection to form.

21 A. **I don't know.**

22 Q. Does any attorney represent you with
 23 respect to any matter for which you have claimed
 24 privilege under the Fifth Amendment to the United
 25 States Constitution?

26 1 MR. GAVENMAN: You are including this
 2 one where it just happened?

3 THE INTERPRETER: Counsel, I think
 4 that was a question for you, right?

5 MR. GAVENMAN: This litigation is
 6 obviously one of them.

7 Do you want that to be part of
 8 the answer or --

9 MR. WOLMAN: He can answer it as he
 10 sees fit.

11 A. **My lawyer here, my counsel, Jeff.**

12 Q. Have you claimed the protections of
 13 the Fifth Amendment to the United States
 14 Constitution in any other lawsuit?

15 MR. GAVENMAN: I'm going to caution
 16 him again not to reveal any attorney/client
 17 communications about this. I believe that
 18 your understanding may come from that. So
 19 please don't reveal any attorney/client
 20 communications.

21 A. Yes.

22 Q. In what other lawsuits have you
 23 claimed the protections to the Fifth Amendment to
 24 the United States Constitution?

25 A. I don't recall.

Transcript of Howan Kwok

8 (29 to 32)

Conducted on April 1, 2021

	29		31
1	Q. When was the last time before this	1	Spring New York?
2	month you claimed the protection of the Fifth	2	MR. GAVENMAN: On advice of Mr. Guo's
3	Amendment of the United States Constitution?	3	counsel, Mr. Guo declines to answer the
4	And when I say this month, I mean	4	question invoking his rights under the Fifth
5	the last 30 days.	5	Amendment of the U.S. Constitution.
6	MR. GAVENMAN: Objection to form.	6	Q. Are you accepting your attorney's
7	A. I don't recall.	7	advice not to answer?
8	Q. Was your claim under the Fifth	8	A. Yes.
9	Amendment in the last year other than this	9	Q. Are you an officer of Golden Spring
10	lawsuit?	10	New York limited?
11	A. I don't recall.	11	MR. GAVENMAN: On advice of Mr. Guo's
12	Q. Does Mr. Podhaskie send bills in your	12	counsel, Mr. Guo declines to respond to the
13	name?	13	question invoking his rights under the Fifth
14	MR. GAVENMAN: Objection to form.	14	Amendment of the U.S. Constitution.
15	A. I don't understand your question. I	15	Q. Are you accepting your attorney's
16	don't quite understand.	16	advice not to answer?
17	Q. Do you get bills from Attorney	17	A. That's correct.
18	Podhaskie for the services he renders to you?	18	Q. Did Golden Spring or anyone affiliated
19	A. I don't know.	19	with it take part in the decision to sue Mr. Cheng
20	Q. Do you pay Mr. Podhaskie?	20	in Nevada?
21	A. No.	21	MR. GAVENMAN: To the extent you can
22	Q. Who pays Mr. Podhaskie?	22	answer without revealing attorney/client
23	A. Golden Spring.	23	communications, you can answer, but I
24	Q. Why does Mr. Golden Spring pay	24	caution you not to reveal attorney/client
25	Mr. Podhaskie for services rendered to you in your	25	communications.
	30		32
1	individual capacity?	1	A. I did talk to my counsel about this
2	MR. GAVENMAN: Under the advice of	2	matter, so because that would involve the
3	Mr. Guo's personal counsel, Mr. Guo declines	3	privilege between counsel and client, so I cannot
4	to respond to the question invoking his	4	answer this question.
5	rights under the Fifth Amendment of the U.S.	5	Q. Which counsel are you referring to?
6	Constitution.	6	A. Daniel.
7	Q. Are you accepting your attorney's	7	Q. Is Mr. Podhaskie employed by Golden
8	advice not to answer?	8	Spring New York or is he an independent outside
9	A. Yes.	9	vendor?
10	Q. Are you aware that Mr. Cheng had a	10	A. I don't know.
11	judgment against you in Nevada?	11	Q. Where is the office of Golden Spring
12	A. That I know.	12	12 New York?
13	Q. Are you aware that that judgment was	13	A. 61st Street -- sorry, 64th Street.
14	paid on your behalf by Golden Spring New York?	14	Q. And where is Mr. Podhaskie's office?
15	A. Yes.	15	A. I seem to have seen him in the Golden
16	Q. Why did Golden Spring New York pay	16	Spring office, but I think that he might have
17	that judgment on your behalf?	17	17 other offices as well. But I don't know where
18	MR. GAVENMAN: On advice of Mr. Guo's	18	they are.
19	counsel, Mr. Guo declines to answer that	19	Q. On the day you signed the verification
20	question invoking his rights under the Fifth	20	statement marked as Exhibit 2, why did you sign it
21	Amendment of the U.S. Constitution.	21	at Golden Spring?
22	Q. Are you accepting your attorney's	22	MR. GAVENMAN: Objection to form.
23	advice?	23	A. I don't remember signing the document
24	A. That's correct.	24	in Golden Spring. I don't ever state that I have
25	Q. Do you own any interest in Golden	25	signed this document in Golden Spring. I think

Transcript of Howan Kwok

9 (33 to 36)

Conducted on April 1, 2021

	33		35
1	that you probably have mistaken my testimony. I	1	I don't know.
2	have never said that I signed this document in	2	Q. Please answer the question as stated
3	Golden Spring.	3	to the best of your ability.
4	Q. Where did you meet with Mr. Podhaskie	4	A. My answer is no, I can't recall.
5	to sign this document?	5	Q. Are you currently represented in any
6	A. My answer was that I don't recall.	6	matter by an attorney named Aaron Mitchell?
7	And why would you just like talking rubbish and	7	MR. GAVENMAN: Not just in this
8	telling me that I signed in Golden Spring. I said	8	matter, Jay? You are talking about any
9	I don't recall.	9	other matter?
10	Q. Did Mr. Podhaskie print out the	10	MR. WOLMAN: Please don't answer the
11	document for you to sign?	11	question for him. You are now answering a
12	A. I don't recall.	12	question for him.
13	Q. Did you print out the document to be	13	MR. GAVENMAN: OK. He is represented
14	signed as Exhibit 2?	14	in this matter --
15	A. I don't recall.	15	MR. WOLMAN: If you have an
16	Q. Why did you choose Mr. Podhaskie to	16	objection, make your objection. Right now
17	notarize this document?	17	you are --
18	A. Well, according to law, right?	18	MR. GAVENMAN: Trying to clarify the
19	Q. Why Mr. Podhaskie as opposed to any	19	question.
20	other notary public of the State of New York, is	20	MR. WOLMAN: You're not the deponent.
21	my question.	21	A. Well, at the moment, I know at least
22	A. I trust him.	22	three counsel's name is Aaron. So I actually
23	Q. Do you have any other lawyers beside	23	can't remember Aaron, whatever that you are
24	Mr. Podhaskie and Mr. Gavenman?	24	talking about. So that is why I cannot answer
25	MR. GAVENMAN: Objection to form.	25	that. So that is why I said I don't recall.
	34		36
1	A. Yes.	1	Q. Do you have a representation agreement
2	Q. And who are those other lawyers?	2	with Aaron Mitchell?
3	MR. GAVENMAN: Objection to form.	3	A. I don't know which counsel you're
4	A. I don't recall their names because if	4	talking about, which lawyer you are talking about.
5	they are in English, I don't usually remember	5	I am unable to answer this question.
6	them.	6	Q. Are you aware that an attorney named
7	Just like, for example, my	7	Aaron Mitchell has entered his appearance in this
8	counsel today, you may have referred the counsel	8	case on your behalf?
9	with another name, but I actually just know him as	9	A. I know there is a lawyer named Aaron,
10	Jeff. And I just call him Jeff.	10	but I don't really know whether there is Aaron
11	But that is only natural because	11	Mitchell or what. I just don't know.
12	my reading ability of English probably is	12	Q. Do you have a fee agreement with the
13	equivalent to any one-year-old child in the United	13	lawyer named Aaron?
14	States.	14	A. I know that they may have some such
15	Q. Can you tell me their names as you	15	thing, but I cannot be sure.
16	best are able?	16	Q. Does an attorney named Aaron send you
17	MR. GAVENMAN: Objection to form.	17	bills for services he renders?
18	A. Well, the thing is like I don't really	18	A. I don't recall. I really don't
19	want to mistaken -- like, for example, the	19	recall.
20	president of the United States, Mr. Biden's name	20	Q. Do you pay any bills to the attorney
21	as my counsel, as my lawyer.	21	whose first name is Aaron?
22	I don't really want to make such	22	A. Let me state that clearly, that you
23	kind of a mistake. It would be rather	23	see I am unable to answer this question is because
24	irresponsible for me to mistaking anybody's name,	24	I don't have a bank account, personal bank
25	and -- as my counsel. And I would rather just say	25	account. I don't make payments. So any payment

Transcript of Howan Kwok

10 (37 to 40)

Conducted on April 1, 2021

	37		39
1 involved probably will be paid by Golden Spring on		1 Golden Spring New York Limited?	
2 my behalf.		2 A. I don't know.	
3 So I really am not able to answer that.		3 Q. Do you sign tax returns on behalf of	
4 Q. Why would Golden Spring pay attorney		4 Golden Spring New York Limited?	
5 Aaron on your behalf?		5 A. I didn't.	
6 MR. GAVENMAN: Under advice of		6 Q. Do you know whether or not Golden	
7 Mr. Guo's counsel, Mr. Guo declines to		7 Spring New York Limited claims payments made on	
8 respond to the question invoking his rights		8 your behalf as a tax deduction in its tax filings?	
9 under the Fifth Amendment of the U.S.		9 A. I don't recall.	
10 Constitution.		10 Q. Are you able to identify any employee	
11 Q. Are you taking your attorney's advice		11 of Golden Spring New York Limited?	
12 in refusing to answer the question?		12 A. No.	
13 A. Yes.		13 Q. Are you able to identify any officer	
14 Q. Does Mr. Gavenman or his firm send you		14 or director of Golden Spring New York Limited?	
15 bills?		15 A. No.	
16 A. I really don't know. I don't know. I		16 Q. Hang on one second. My screens are	
17 really don't know.		17 acting funny. Sorry about that.	
18 Q. Do you pay Mr. Gavenman or his firm		18 Does Golden Spring New York Limited	
19 for the services he is rendering in this case?		19 have any officers or directors?	
20 A. I believe so, but then it would be		20 A. I don't know.	
21 Golden Spring who is paying to them. So I really		21 Q. Earlier, you invoked the protection of	
22 don't know.		22 the Fifth Amendment to the U.S. Constitution when	
23 Q. And why is Golden Spring paying		23 I asked if you were an officer of Golden Spring	
24 Mr. Gavenman and/or his firm?		24 New York Limited. Is that correct?	
25 MR. GAVENMAN: Under advice of		25 A. Yes.	
	38		40
1 Mr. Guo's counsel, Mr. Guo declines to		1 Q. Why does Golden Spring New York	
2 respond to the question invoking his rights		2 Limited pay your bills?	
3 under the Fifth Amendment of the U.S.		3 MR. GAVENMAN: On advice of Mr. Guo's	
4 Constitution.		4 counsel, Mr. Guo declines to respond to the	
5 Q. Are you refusing to answer the		5 question invoking his rights under the Fifth	
6 question under the advice of your counsel?		6 Amendment of the U.S. Constitution.	
7 A. Yes.		7 Q. Are you refusing to answer the	
8 Q. Are you aware of any crimes committed		8 question?	
9 by Golden Spring New York Limited?		9 A. Yes.	
10 A. I don't know.		10 Q. Do you file Federal or State tax	
11 Q. Do you have any written agreements		11 returns?	
12 with Golden Spring New York Limited?		12 A. Yes.	
13 MR. GAVENMAN: Under the advice of		13 Q. Do you report payments made by Golden	
14 Mr. Guo's counsel, Mr. Guo declines to		14 Spring New York Limited as your income when Golden	
15 respond to the question invoking his rights		15 Spring --	
16 under the Fifth Amendment of the U.S.		16 (Simultaneous crosstalk)	
17 Constitution.		17 MR. GAVENMAN: On advice of counsel,	
18 Q. Are you taking your attorney's advice		18 Mr. Guo declines to answer the question	
19 and refusing to answer?		19 invoking his rights under the Fifth	
20 A. Yes.		20 Amendment of the U.S. Constitution.	
21 Q. Do you know whether or not Golden		21 Q. Are you refusing to answer?	
22 Spring New York files New York State or Federal		22 A. Yes.	
23 income tax returns?		23 Q. In the last five years, have you been	
24 A. I don't know.		24 subject to an audit by the Internal Revenue	
25 Q. Do you know who the accountant is for		25 Service or the New York State taxing authority?	

Transcript of Howan Kwok

11 (41 to 44)

Conducted on April 1, 2021

	41		43
1	A. No.	1	TECHNICIAN: OK, to the One Direct
2	Q. Are you presently under investigation,	2	link? Give me one moment. Yes, I see it.
3	to the best of your knowledge, for tax fraud?	3	I am downloading the file now.
4	MR. GAVENMAN: On the advice of	4	Counsel, it's asking me for a
5	Mr. Guo's counsel, Mr. Guo declines to	5	password.
6	respond to the question invoking his rights	6	MR. WOLMAN: Shoot, sorry about that.
7	under the Fifth Amendment of the U.S.	7	Q. All right. Why don't we do this.
8	Constitution, as well as an objection to	8	Mr. Kwok, did you review the tax returns that were
9	attorney/client privilege. Any	9	provided by your counsel to me in this case?
10	communications he might, my understanding,	10	A. Yes.
11	he might have about this is subject to	11	Q. Are you aware that it included certain
12	attorney/client privilege.	12	12 tax returns?
13	MR. WOLMAN: How is acknowledging an	13	MR. GAVENMAN: Objection to form.
14	investigation -- not whether or not he	14	A. I don't recall.
15	committed the crime -- self-incrimination?	15	Q. Are you familiar with the accounting
16	MR. GAVENMAN: He is invoking the	16	16 firm named Janover?
17	Fifth Amendment is, as is his right to do	17	A. I think that perhaps it is like a
18	so.	18	financial or accounting consulting firm, but I
19	You can ask a different question	19	cannot be sure.
20	if you like.	20	Q. Do they prepare your New York State
21	Q. Are you refusing to answer?	21	and Federal income taxes?
22	A. Yes.	22	A. Perhaps.
23	Q. Have you had any income as that term	23	Q. Have you filed taxes for the year
24	is used in the Internal Revenue Code within the	24	2020?
25	last five years?	25	A. Yes.
	42		44
1	MR. GAVENMAN: On the advice of	1	Q. And who was the accountant who
2	counsel, Mr. Guo's personal counsel,	2	prepared the tax returns?
3	Mr. Grow declines to respond to the question	3	A. I don't recall.
4	invoking his rights under the Fifth	4	Q. When did you file these tax returns?
5	Amendment of the U.S. Constitution.	5	MR. GAVENMAN: Objection to form.
6	Q. Are you refusing to answer the	6	A. I don't recall.
7	question?	7	Q. Was it before or after March 25?
8	A. Yes.	8	A. I don't recall.
9	Q. How much income did you report to the	9	Q. Did you pay any taxes to New York
10	Internal Revenue Service in your tax return for	10	State or the Federal government for the year 2020?
11	11 the fiscal year 2019?	11	MR. GAVENMAN: On advice of counsel,
12	MR. GAVENMAN: On the advice of	12	12 Mr. Guo declines to respond to the question
13	counsel, Mr. Guo declines to respond to the	13	13 invoking his rights under the Fifth
14	question invoking his rights under the Fifth	14	14 Amendment of the U.S. Constitution.
15	Amendment of the U.S. Constitution.	15	MR. WOLMAN: Whether or not he paid
16	MR. WOLMAN: Jeff, you provided me	16	16 any taxes is already known to a third-party,
17	the tax return.	17	17 the government.
18	MR. GAVENMAN: That was a required	18	MR. GAVENMAN: He is not going to
19	record exception. That doesn't mean he can	19	provide any testimony about it.
20	answer a question about it.	20	Q. Mr. Guo, are you refusing to answer?
21	Q. Are you refusing to answer?	21	A. Yes.
22	A. Yes.	22	Q. When your tax returns are prepared, do
23	Q. Just one second.	23	23 you provide your tax preparer all information
24	MR. WOLMAN: OK. Ms. Hooper. I just	24	24 about your income?
25	up uploaded some documents in a zip file.	25	MR. GAVENMAN: On advice of Mr. Guo's

Transcript of Howan Kwok

12 (45 to 48)

Conducted on April 1, 2021

	45		47
1	counsel, Mr. Guo declines to respond to the	1	information to the United States immigration
2	question invoking his rights under the Fifth	2	authorities in connection with your application
3	Amendment of the U.S. Constitution.	3	for asylum?
4	Q. Are you refusing to answer the	4	A. No.
5	question?	5	Q. Are you familiar with law firm named
6	A. Yes.	6	Baker Hostetler?
7	Q. Have you received any communications	7	A. I don't recall this name. I am very
8	from the New York State taxing authority regarding	8	confused with English names.
9	potential tax fraud?	9	Q. Are you aware of a lawsuit -- you
10	MR. GAVENMAN: On advice of Mr. Guo's	10	strike that.
11	counsel, Mr. Guo declines to respond to the	11	You mentioned the Pacific Alliance
12	question invoking his rights under the Fifth	12	lawsuit previously, correct?
13	Amendment of the U.S. Constitution, as well	13	A. Yes.
14	as attorney/client privilege as a separate	14	Q. Do you know who your attorneys are or
15	basis for objection.	15	the law firm is for that case?
16	Q. Are you refusing to answer?	16	A. I don't recall.
17	A. Yes.	17	Q. Did you receive bills for services
18	Q. Have you received any communications	18	rendered on your behalf in that case?
19	from the United States Internal Revenue Service or	19	A. I don't recall.
20	the U.S. Department of Treasury or U.S. Department	20	Q. Are bills paid to whoever is
21	of Justice regarding potential tax fraud?	21	representing you in that case?
22	MR. GAVENMAN: Once again, on advice	22	A. Of course they should be paid.
23	of Mr. Guo's counsel, Mr. Guo declines to	23	Q. Who is paying those bills?
24	respond to the question invoking his rights	24	A. Golden Spring.
25	under the Fifth Amendment of the U.S.	25	Q. Does Baker & Hostetler or whatever law
	46		48
1	Constitution, and once again, another	1	firm is representing you in that case have a fee
2	objection based on attorney/client	2	agreement with Golden Spring?
3	privilege.	3	A. I don't recall.
4	Q. Are you refusing to answer?	4	Q. Does any attorney representing you in
5	A. Yes.	5	this case have a fee agreement with Golden Spring?
6	Q. In the past seven years have you	6	A. I don't know.
7	provided false information in a tax return to the	7	Q. Why does Golden Spring pay your bills
8	United States or to the state of New York?	8	for representation in the Pacific Alliance
9	MR. GAVENMAN: On advice of Mr. Guo's	9	lawsuit?
10	counsel, Mr. Guo declines to respond to the	10	MR. GAVENMAN: On advice of Mr. Guo's
11	question invoking his rights under the Fifth	11	counsel, Mr. Guo declines to respond to the
12	Amendment of the U.S. Constitution.	12	question invoking his rights under the Fifth
13	Q. Are you refusing to answer?	13	Amendment of the U.S. Constitution.
14	A. Yes.	14	A. Yes.
15	Q. In the past seven years, have you	15	Q. Are you refusing to answer?
16	knowingly provided any false information in a tax	16	A. Yes.
17	return to the State of New York or the Internal	17	Q. Are you familiar with attorneys named
18	Revenue Service?	18	Chris Rose or Silvestri?
19	MR. GAVENMAN: On advice of counsel,	19	A. I don't recall.
20	Mr. Guo declines to respond to the question	20	Q. Do you recall the name of the attorney
21	invoking his rights under the Fifth	21	who represented you prior to Mr. Gavenman in
22	Amendment of the U.S. Constitution.	22	Nevada?
23	Q. Are you refusing to answer?	23	MR. GAVENMAN: Objection to form.
24	A. Yes.	24	THE INTERPRETER: Counsel, did you
25	Q. Have you provided any false	25	say something?

Transcript of Howan Kwok

13 (49 to 52)

Conducted on April 1, 2021

	49		51
1	MR. GAVENMAN: I said objection to	1	Q. Where is Golden Spring New York
2	form.	2	getting the funds to pay your bills?
3	A. I don't recall the counsel's name.	3	A. I don't know.
4	Q. Did you have a fee agreement with the	4	Q. When Golden Spring makes payments on
5	law firm that preceded Mr. Gavenman in the Nevada	5	your behalf, how do you let Golden Spring know
6	litigation?	6	that a payment needs to be made?
7	A. What name again you said?	7	A. That is all arranged by Golden Spring.
8	Q. Whichever law firm it was.	8	Q. By whom at Golden Spring?
9	A. I don't recall.	9	A. Counselors, lawyers.
10	Q. Who paid the bills of the law firm	10	Q. Let me try to do it this way. Does
11	representing you in the Nevada lawsuit against	11	Mr. Gavenman send you a bill?
12	Mr. Cheng?	12	A. I never receive bills that counsel
13	A. Golden Spring.	13	sent to me.
14	Q. Why did Golden Spring pay those bills?	14	Q. Where does he send the bills?
15	MR. GAVENMAN: On advice of Mr. Guo's	15	A. Send to the lawyer in Golden Spring.
16	counsel, Mr. Guo declines to respond to the	16	Q. So Mr. Gavenman's fee agreement--
17	question invoking his rights under the Fifth	17	strike that.
18	Amendment of the U.S. Constitution.	18	So Mr. Gavenman's bills go directly to
19	Q. Are you refusing to answer?	19	Mr. Podhaskie?
20	A. Yes.	20	A. I don't know.
21	Q. What are the -- what is the income of	21	Q. How do you know Golden Spring is
22	Golden Spring New York Limited?	22	paying Mr. Gavenman?
23	A. I don't know.	23	A. I don't know.
24	Q. How does Golden Spring New York	24	Q. Did Golden Spring have any role in
25	Limited generate revenue?	25	deciding to sue Mr. Cheng?
	50		52
1	A. I don't know.	1	MR. GAVENMAN: I caution you not to
2	Q. What are the assets of Golden Spring	2	reveal any attorney/client communications in
3	New York Limited?	3	this answer.
4	MR. GAVENMAN: On advice of Mr. Guo's	4	You can answer if you can.
5	counsel, Mr. Guo declines to respond to the	5	A. I don't know.
6	question invoking his rights under the Fifth	6	Q. A judgment was issued against you in
7	Amendment of the U.S. Constitution.	7	Nevada. How did you receive that judgment?
8	MR. WOLMAN: Jeff -- Jeff, that's a	8	A. I did not receive it.
9	question about Golden Spring assets, that is	9	Q. Have you ever seen a copy of the
10	not a party and, my understanding, is not	10	judgment from the Nevada court against you?
11	your client? How is there a Fifth Amendment	11	A. No.
12	issue here?	12	Q. Did you ever receive anything in the
13	MR. GAVENMAN: There is a Fifth	13	mail from Randazza Legal Group sent to you at the
14	Amendment issue so he is declining to	14	Sherry-Netherland?
15	respond.	15	A. No.
16	MR. WOLMAN: How?	16	Q. Do you receive mail at the
17	MR. GAVENMAN: Jay, I can't answer	17	Sherry-Netherland?
18	that question for you. That's the answer,	18	A. Yes, we can receive mail -- well, I
19	he is invoking his Fifth Amendment rights.	19	want counsel you understand this. You see mail
20	He needs to not respond.	20	can be received. But the thing is I really cannot
21	Q. Are you refusing to answer, Mr. Kwok?	21	read English and so I won't read anything in
22	A. Yes.	22	English. I was not able to read anything in
23	Q. Does Golden Spring New York Limited	23	English.
24	have any bank accounts?	24	So that mails could be received, but I
25	A. I don't know.	25	won't read them. I'm unable to read them, even if

Transcript of Howan Kwok

14 (53 to 56)

Conducted on April 1, 2021

	53		55
1	you put them in front of me today, I won't be able	1	like a representative of Democratic parties and so
2	to read them either.	2	on and so forth and wanting to come upstairs and
3	So I am saying that, yes, mails can be	3	presenting sort of threats.
4	received, but I, myself personally won't read them.	4	So therefore, nowadays in
5	I myself personally did not receive them.	5	Sherry-Netherland, that they know the security
6	Q. Who did?	6	threats that posted, and so therefore, that they
7	A. Golden Spring.	7	were very careful about dealing with all kind of
8	Q. How does mail get from the	8	documents and the source of documents and so that
9	Sherry-Netherland Hotel directed to you into the	9	would have special arrangement between them and
10	hands of Golden Spring?	10	Golden Spring legal team.
11	A. I don't know.	11	And so anyway, really, because it
12	Q. Then how do you know Golden Spring is	12	is about this -- it's like a warfare nation is
13	getting your mail?	13	targeting me as an individual.
14	A. It is because after receiving them,	14	Q. So to be clear, before you look at any
15	the lawyer in Golden Spring, Daniel, would have	15	piece of mail, someone at Golden Spring is reading
16	talked to me and told me they received the	16	it first, correct?
17	whatever. And then they would need to get the	17	A. Not necessarily.
18	translator and translating those letters, so that	18	Q. How is it then determined that you
19	I would know about those letters.	19	need to have it, a piece of mail, translated for
20	Well, you see it will be -- you know	20	20 you?
21	that at the present time, there are 60 some lawsuits	21	A. I don't know.
22	going on and they were involved because of the CCP's	22	Q. Is everybody affiliated -- strike
23	threat against me, the Chinese Communist Party	23	that.
24	threat against me, and they have done all these kind	24	Is everybody employed by Golden Spring
25	of restricted warfare against me, threatening me.	25	New York a lawyer?
	54		56
1	And so, you see, they sometimes	1	A. No.
2	would send me things or letters probably with	2	Q. Is Golden Spring New York a law firm?
3	toxins inside, threatening letters about my death	3	A. No.
4	and about my -- anything that is threatening to my	4	Q. So any time, for example, Mr. Gavenman
5	person.	5	sends you a letter or a bill, Golden Spring gets
6	So that is why the things received would	6	6 it before you do?
7	have to go through some security teams and security	7	A. I cannot be sure.
8	people to make sure that whether it has contained	8	Q. How would you find out?
9	any toxicity, whether it is any threatening letters,	9	MR. GAVENMAN: Objection to form.
10	whether it should be reported to the police or	10	THE INTERPRETER: Counsel, were you
11	whether it should be dealt with by the legal people.	11	saying something?
12	And then this if some needed for me to know, then	12	MR. GAVENMAN: I just said objection
13	they have to go through the translations and all	13	to form.
14	kind of protocols. So it is rather complicated.	14	But he can answer.
15	So because also, you see there	15	A. Because sometimes the people from
16	are times that there are documents of thousands of	16	Golden Spring would contact me or sometimes the
17	pages, documents sent to me from unknown part of	17	lawyer would contact me.
18	the world from I don't even know where, and those	18	Q. Who are the nonlawyers at Golden
19	documents would have a lot of like threatening	19	Spring who would contact you?
20	language, sometimes contain perhaps innuendoes and	20	MR. GAVENMAN: Objection to form.
21	implications and so on and so forth.	21	A. I cannot recall.
22	And sometimes they would have	22	Q. Is Golden Spring New York at all
23	pretty girls downstairs at the lobby and claiming	23	funded by the Chinese Communist Party?
24	that they have documents for me and sometimes	24	A. Of course not.
25	people claiming -- pretending to be old friends or	25	Q. Is Golden Spring New York funded by

Transcript of Howan Kwok

15 (57 to 60)

Conducted on April 1, 2021

	57		59
1 anyone in the People's Republic of China?		1 wanted to take a quick break, but I just have a	
2 A. I don't know.		2 couple of questions before we do that.	
3 Q. How were you able to answer with		3 A. G-E-T -- T-E-E-R, yes.	
4 certainty that the Chinese Communist Party does		4 Q. What is that device you were holding	
5 not fund it when you previously testified that you		5 in your hand just a moment ago?	
6 do not know its income sources?		6 A. My cell phone.	
7 A. Well, you see that based on what I		7 Q. And what kind of cell phone is it?	
8 know is that Golden Spring had been on the list of		8 A. Apple.	
9 the at risk entity made by the Communist Party and		9 Q. And when did you -- when was it	
10 also as I know that Golden Spring sometimes will		10 purchased?	
11 be rejected by bank for having a bank account with		11 A. One week ago.	
12 the bank.		12 Q. And who purchased it?	
13 And as far as I know, that I,		13 A. I don't know.	
14 myself and Golden Spring was also being listed by		14 Q. How did it get in your hands?	
15 the Chinese Communist Party as a number 1 national		15 A. It's in the office.	
16 enemy. And there are lots of employees in the		16 Q. Some unknown person left it for you in	
17 Golden Spring disappeared and arrested in China, a		17 an office, is that what you are saying?	
18 lot of videos of such have been circulated online		18 A. Well, I don't know who actually got	
19 and that is really a very basic knowledge to		19 it.	
20 everyone.		20 What happened was I told the	
21 Q. Can you please name the employees of		21 lawyer, I said my phone was hacked again because	
22 Golden Spring that you state were arrested or		22 you see my phone always gets hacked, nearly every	
23 disappeared?		23 week was hacked.	
24 MR. GAVENMAN: Objection to form.		24 So I said my phone was hacked and	
25 A. At this point, I actually don't recall		25 so I need to have a new phone.	
	58		60
1 their names, but then there are lots of such		1 Q. Who paid for the phone?	
2 videos and information circulated online. You can		2 A. I don't know.	
3 just have a search for it.		3 Q. Does it have a cellular data plan?	
4 Q. You previously testified that you made		4 A. I don't know.	
5 a video this morning and uploaded it. On what		5 Q. In whose name does the cellular data	
6 system did you upload it?		6 plan exist?	
7 A. GTV Geteer.		7 A. I don't know.	
8 THE REPORTER: Can you spell that?		8 Q. Can you show the home screen right	
9 THE WITNESS: I don't know how to		9 now? On camera?	
10 spell that. I can only tell you the Chinese		10 A. (Witness complies)	
11 name is GTV Geteer.		11 Q. Turn it around.	
12 THE REPORTER: Geteer, just		12 And can you unlock it so we can	
13 confirming.		13 see the data carrier? Can you hold that up to the	
14 THE INTERPRETER: I don't know. I am		14 camera? Closer. Can you get within inches of it,	
15 actually --		15 please?	
16 A. Hold own. Let me check, do you want		16 MR. GAVENMAN: What is the possible	
17 me to find out the name?		17 relevance of what's on his home screen? I	
18 Q. Sure.		18 actually really object to this. What are we	
19 A. Because I don't have anything in here,		19 doing with his personal home screen and his	
20 so I just really need to -- note paper, nothing,		20 phone? There is no reason he has to be	
21 so I just need to go and check. G-E-T-E-E-R.		21 showing his personal home screen on his	
22 Q. So that's the name, GTV Geteer,		22 telephone.	
23 G-E-T-E-E-R?		23 MR. WOLMAN: I'm looking to see who	
24 A. OK.		24 the carrier is.	
25 Q. Sorry, I know the court reporter		25 Q. Can you step back about 8 centimeters.	

Transcript of Howan Kwok

16 (61 to 64)

Conducted on April 1, 2021

	61		63
1	OK, I can't read it. In the	1	phone?
2	upper left corner, what are the letters?	2	A. I don't know.
3	A. No letters.	3	Q. Do you text anyone from that phone?
4	Q. Does it say "AT&T" or "Verizon" or --	4	A. No, I don't know.
5	A. No.	5	Q. Do you call anyone from that phone?
6	Q. -- T-Mobile?	6	A. I don't know.
7	A. No.	7	Q. Does anybody call you on that phone?
8	Q. I'm going to ask that you do a screen	8	A. I don't know.
9	capture of the home screen.	9	Q. Without revealing the contents of any
10	MR. GAVENMAN: No, no, we are not	10	conversation, have you spoken to Mr. Gavenman on
11	doing that. We are not doing that. Come	11	the phone?
12	on.	12	A. No.
13	This is ridiculous. He doesn't need	13	Q. Prior to today, have you ever spoken
14	to do a screen capture of his personal cell	14	with Mr. Gavenman?
15	phone screen. That's just -- we are not	15	A. I don't recall.
16	doing that.	16	Q. Did you go down to Baltimore to meet
17	MR. WOLMAN: Jeff, he brought it to a	17	with Mr. Gavenman?
18	deposition.	18	A. No.
19	MR. GAVENMAN: You had him get it for	19	Q. Did Mr. Gavenman come up to New York
20	his deposition. He is not looking at it	20	20 to meet with you?
21	other than to tell you one name of an app or	21	A. No.
22	whatever that was.	22	Q. How do you communicate with
23	He is not doing a screen capture	23	Mr. Gavenman?
24	and sending it to you. It's not	24	A. I don't recall.
25	happening.	25	Q. Did you prepare for this deposition --
	62		64
1	Q. What is the phone number that someone	1	strike that.
2	could use to call you on that phone?	2	Did Mr. Gavenman assist you in
3	MR. GAVENMAN: That's another thing	3	preparing for this deposition?
4	I'm going to object to. He doesn't have to	4	A. Yes.
5	answer that.	5	Q. Without revealing the contents of any
6	There is no reason he has to give	6	6 of that preparation, did you meet in person?
7	his personal cell phone number on this	7	A. No.
8	transcript. There is no possible	8	Q. Through what means did you communicate
9	reason. It is harassing. There is no	9	9 with Mr. Gavenman?
10	reason for this. Let's move on to	10	A. I don't know what kind of a form that
11	relevant questions.	11	11 was.
12	It has been two hours and 15	12	Q. Did you have a phone call with him?
13	minutes of a marathon session and you	13	A. No.
14	haven't gotten to relevant questions	14	Q. Did you have a video meeting like this
15	yet.	15	15 with them?
16	Q. Please answer the question.	16	A. Yes.
17	MR. GAVENMAN: You don't have to	17	Q. And how did you get the link?
18	answer what your current personal cell phone	18	A. Arranged by the lawyer.
19	is.	19	Q. How was it transmitted to you?
20	MR. WOLMAN: I'm allowed to find out	20	A. I went into the room and the
21	who is paying the bill for his personal cell	21	connection was made.
22	phone as you represented.	22	Q. How did you know the URL to connect?
23	THE INTERPRETER: Counsel, what	23	A. I don't know about the URL. It was
24	question should I be interpreting?	24	all connected by the lawyers and the Golden
25	Q. What is the phone number for that	25	Spring.

Transcript of Howan Kwok

17 (65 to 68)

Conducted on April 1, 2021

<p style="text-align: right;">65</p> <p>1 Q. For today's deposition, how did you 2 obtain the URL on the device you were using to 3 broadcast today?</p> <p>4 A. It was arranged by the lawyer in 5 Golden Spring.</p> <p>6 Q. Was the lawyer at Golden Spring 7 literally in that room this morning at 8 approximately 10 a.m.?</p> <p>9 A. Well, when I stepped into the room, 10 the room was already empty and everything is 11 already connected. It's ready. I don't -- I did 12 not see anyone.</p> <p>13 Q. Who literally pressed on the link to 14 connect?</p> <p>15 A. So I pressed the link and then I went 16 in.</p> <p>17 Q. And how did the link get on to the 18 device that you pressed?</p> <p>19 A. I don't know.</p> <p>20 Q. Does your phone have an e-mail account 21 associated with it?</p> <p>22 A. I don't have e-mail.</p> <p>23 Q. Have you ever had an e-mail account?</p> <p>24 A. I have never used e-mail ever since at 25 school. Even though the Chinese Communist Party</p>	<p style="text-align: right;">67</p> <p>1 In connection with your 2 application for asylum, did you state that you or 3 any member of your family committed any crime in 4 the United States?</p> <p>5 A. No.</p> <p>6 Q. When did you apply for asylum?</p> <p>7 A. September 2017.</p> <p>8 Q. Prior to September 2017, did you 9 submit any false information knowingly in 10 connection with a tax return to the Federal 11 government or New York State?</p> <p>12 MR. GAVENMAN: On the advice of 13 Mr. Guo's counsel, Mr. Guo declines to 14 respond to the question invoking his Fifth 15 Amendment rights under the U.S. 16 Constitution.</p> <p>17 Q. Are you refusing to answer?</p> <p>18 A. Yes.</p> <p>19 Q. In connection with your application 20 for asylum, did you invoke your rights under the 21 Fifth Amendment to the U.S. Constitution?</p> <p>22 A. I don't understand your question.</p> <p>23 Q. With respect to your application for 24 asylum, did you claim the protection of the Fifth 25 Amendment as you are doing now?</p>
<p style="text-align: right;">66</p> <p>1 fabricated the information that I have lots of 2 e-mail addresses, I actually have not one. I have 3 never used e-mail ever.</p> <p>4 Q. So are you saying that there is no 5 e-mail account associated with the video upload 6 service you used this morning?</p> <p>7 A. That's correct.</p> <p>8 Q. Why don't we take a break.</p> <p>9 (Recess; 12:22 p.m. to 12:45 p.m.)</p> <p>10 Q. Mr. Kwok, previously you testified 11 that everything that -- your application for 12 asylum I guess was accurate, correct?</p> <p>13 A. Yes.</p> <p>14 Q. Do you recall filling out a form I589?</p> <p>15 A. No, I don't recall.</p> <p>16 Q. Do you recall a question on an 17 application for an asylum that states, "Have you 18 or any member of your family included in the 19 application ever committed any crime and/or been 20 arrested, charged, convicted or sentenced for any 21 crimes in the United States, including for an 22 immigration law violation?"</p> <p>23 A. I don't recall.</p> <p>24 Q. Then let me ask you, have you or -- 25 strike that.</p>	<p style="text-align: right;">68</p> <p>1 A. I still don't understand that 2 question.</p> <p>3 Q. Did you refuse to answer any questions 4 on your application for asylum on the grounds that 5 it would incriminate you in a crime?</p> <p>6 A. I still don't understand the question.</p> <p>7 Q. Did you refuse to answer any questions 8 on your asylum application?</p> <p>9 A. I still don't understand that 10 question.</p> <p>11 Q. Did you apply for asylum?</p> <p>12 A. Yes.</p> <p>13 Q. Were there questions?</p> <p>14 A. Yes.</p> <p>15 Q. Did you answer all those questions?</p> <p>16 A. Yes.</p> <p>17 Q. Did you refuse to provide any 18 information in answering those questions?</p> <p>19 A. I don't understand.</p> <p>20 Q. Did you give all of the information 21 that was requested on your application for asylum?</p> <p>22 MR. GAVENMAN: I'm going to caution 23 you not to reveal any attorney/client 24 communications that may have informed your 25 understanding of what the application</p>

Transcript of Howan Kwok

18 (69 to 72)

Conducted on April 1, 2021

	69		71
1	required or what you provided.	1	objection. That didn't fix the issue at
2	A. Yes. Yes, I answered yes.	2	all. The only way to have any knowledge or
3	Q. Do you know if you have a particular	3	understanding about what he is required to
4	obligation to update the information provided in	4	provide --
5	connection with your asylum application?	5	MR. WOLMAN: That is false, that is
6	MR. GAVENMAN: Objection, objection.	6	false. What he knows is what he knows.
7	The only way he would have any understanding	7	MR. GAVENMAN: How would he know it,
8	of that is through attorney/client	8	Jay? How would he understand what the U.S.
9	communications. He can't answer that	9	law requires? Come on.
10	without attorney/client communications.	10	MR. WOLMAN: How would he know. So
11	MR. WOLMAN: I entirely disagree with	11	you are saying immigrants have no obligation
12	that assessment.	12	to know the law?
13	Q. Are you refusing to answer that	13	MR. GAVENMAN: He would have an
14	question on the advice of counsel?	14	understanding from counsel about what the
15	A. Yes.	15	law requires.
16	Q. Have you ever provided updated	16	MR. WOLMAN: We haven't even
17	information to the U.S. Government in connection	17	established that he used an attorney.
18	with your application for asylum?	18	MR. GAVENMAN: You know he was
19	MR. GAVENMAN: And this -- I'm going	19	represented by an attorney.
20	to caution you not to reveal any	20	Counsel, let's ask a more
21	attorney/client communications.	21	fundamental question, what in the world
22	To the extent you can answer, you	22	are you talking about his immigration
23	can, but please don't reveal	23	application, his asylum application?
24	attorney/client communications.	24	MR. WOLMAN: Mark, quiet.
25	MR. WOLMAN: Jeff, I'm asking what he	25	MR. GAVENMAN: Mark, do you want to
	70		72
1	gave. Don't coach your witness.	1	appear in New York --
2	MR. GAVENMAN: That's not coaching my	2	MR. RANDAZZA: No.
3	witness. You asked if there was ever a	3	MR. GAVENMAN: And get some
4	supplement. You don't know if it is on his	4	out-of-your-jurisdiction practice, go ahead.
5	behalf, what he did.	5	This asylum application has no
6	I said don't reveal any	6	relevance to this proceeding whatsoever. I
7	attorney/client communications and	7	don't know why you're asking about it and
8	that's it. That's the instruction.	8	I'm getting close to instructing the witness
9	It's not anything obstructive. It's	9	not to answer any more questions about it.
10	just informing the witness not to reveal	10	This is completely outside of the
11	anything attorney/client --	11	scope of these deposition, you have
12	Q. Just answer the question.	12	asked questions about it for several
13	A. I don't recall.	13	minutes now. You know --
14	Q. Have you withheld any information from	14	(Simultaneous crosstalk)
15	U.S. immigration authorities that you were	15	MR. WOLMAN: Stop coaching.
16	required to provide?	16	MR. GAVENMAN: It's not coaching,
17	MR. GAVENMAN: Objection. The only	17	that's an objection based on privilege.
18	way he would have any understanding of what	18	That's not coaching.
19	he was required to provide is through	19	BY MR. WOLMAN:
20	counsel.	20	Q. Mr. Guo, answer the question.
21	MR. WOLMAN: I will rephrase.	21	MR. GAVENMAN: You know he was
22	Q. Mr. Guo, have you knowingly withheld	22	represented by counsel in that proceeding.
23	any information you are required to provide with	23	You know he is getting advice from counsel
24	the immigration --	24	what the requirements are. You are starting
25	MR. GAVENMAN: I make the exact same	25	to border on trying to elicit

Transcript of Howan Kwok

19 (73 to 76)

Conducted on April 1, 2021

	73		75
1 attorney/client communications like you're 2 not supposed to.		1 willy-nilly basis when sometimes you are 2 going to testify about the crimes you did or 3 did not commit and then say no, Fifth 4 Amendment?	
3 BY MR. WOLMAN:		5 MR. GAVENMAN: Strike the answer, he 6 is invoking the Fifth Amendment. We are not 7 addressing any bit of his income or taxes or 8 anything like that.	
4 Q. Mr. Guo, answer the question.		9 MR. WOLMAN: I'm not agreeing to 10 strike anything. Thank you.	
5 MR. GAVENMAN: Don't answer the 6 question. There is an attorney/client 7 objection. He can't answer the question 8 without attorney/client communications.		11 Q. Mr. Kwok, are you refusing to answer 12 the question?	
9 MR. WOLMAN: That is false.		13 A. I don't. I don't have. Very simple 14 answer. I don't.	
10 BY MR. WOLMAN:		15 Q. Do you have any assets?	
11 Q. Answer the question?		16 MR. GAVENMAN: On the advice of 17 counsel, Mr. Guo declines to respond to the 18 question invoking his rights under the Fifth 19 Amendment of the U.S. Constitution.	
12 THE INTERPRETER: Counsel, I don't 13 know if I interpreted that question or not.		20 Q. Are you refusing to answer?	
14 Do you mind to repeat that 15 question?		21 A. Yes.	
16 Q. Have you knowingly withheld any 17 information that you were required to provide U.S. 18 immigration authorities?		22 Q. Do you own the clothes you are 23 wearing?	
19 MR. GAVENMAN: Same objection.		24 MR. GAVENMAN: On advice of his 25 counsel, Mr. Guo declines to respond to the	
20 A. I don't understand this question 21 actually.	74		76
22 Q. Have you told U.S. immigration 23 authorities whether or not you have committed tax 24 fraud?		1 question invoking his rights under the Fifth 2 Amendment of the U.S. Constitution.	
25 A. No. But I have never committed any 1 tax fraud. So why would he I need to tell them 2 that.		3 Q. Are you refusing to answer?	
3 Q. If you have not committed tax fraud, 4 are all of your income tax returns that you've 5 submitted to the U.S. Government in the State of 6 New York accurate?		4 A. Yes.	
7 MR. GAVENMAN: On the advice of 8 counsel, Mr. Guo declines to respond to the 9 question invoking his rights under the Fifth 10 Amendment of the U.S. Constitution.		5 Q. I see that you're drinking something 6 in a tea glass. Who paid for the contents?	
11 MR. WOLMAN: Mr. Guo just told us 12 that he never committed tax fraud.		7 A. Golden Spring.	
13 MR. GAVENMAN: Understood. He is not 14 going to testify about it.		8 Q. Does Golden Spring buy your groceries?	
15 MR. WOLMAN: He just did.		9 A. Sometimes, yes.	
16 MR. GAVENMAN: He is not going to 17 testify anymore about it.		10 Q. Why does Golden Spring pay for your 11 groceries?	
18 MR. WOLMAN: This is not a piecemeal 19 thing. You are either accepting the 20 protections of the Fifth Amendment or you 21 are not.		12 MR. GAVENMAN: On advice of Mr. Guo's 13 counsel, Mr. Guo declines to respond to the 14 question invoking his rights under the Fifth 15 Amendment of the U.S. Constitution.	
22 MR. GAVENMAN: We are certainly 23 invoking the protections of the Fifth 24 Amendment.		16 Q. Are you refusing to answer?	
25 MR. WOLMAN: You can't do it on a		17 A. Yes.	
		18 Q. Who pays for your clothes?	
		19 A. Golden Spring.	
		20 Q. Why does Golden Spring pay for your 21 clothes?	
		22 MR. GAVENMAN: On advice of counsel, 23 Mr. Guo declines to respond to the question 24 invoking his rights under the Fifth 25 Amendment of the U.S. Constitution.	

Transcript of Howan Kwok

20 (77 to 80)

Conducted on April 1, 2021

	77		79
1	Q. Are you refusing to answer?	1	Q. Please, please.
2	A. Yes.	2	A. (In English) I no stop, that is my
3	Q. Are you, remind me, at the	3	power.
4	Sherry-Netherland residence right now?	4	MR. WOLMAN: We are calling the court
5	A. Yes.	5	right now.
6	Q. Does anybody live with you?	6	The contact information is --
7	A. Sometimes my family will be here.	7	this deposition is paused for right now.
8	Q. Are you married?	8	MR. GAVENMAN: Miles, you can go off
9	A. Yes.	9	mute, go off camera. I will be joining the
10	Q. Where does your wife live?	10	court line momentarily.
11	A. She lives in her place.	11	(Counsel agree to go off the
12	Q. Where is that?	12	record.)
13	A. I can't tell you her information.	13	(Recess; 1:09 p.m. to 1:39 p.m.)
14	That is about her.	14	MR. WOLMAN: We just had a conference
15	Q. Why not?	15	with the judge in which it was indicated
16	A. Well, it is because the question that	16	that there would be submissions with
17	you are asking exactly what the CCP wanted to ask	17	regarding the invocation of the Fifth
18	and you representing Cheng Shuiyan's case and that	18	Amendment privilege as has been done here
19	is because you are a hooligan counsel representing	19	today. And that if the judge finds that it
20	the CCP and all the questions you are asking were	20	has been overbroad, that I would be
21	irrelevant to the case, but threatening to the	21	permitted to ask questions regarding assets
22	life -- the safety of my wife and that is exactly	22	at a separate continued deposition date.
23	what the information that -- what the CCP wanted	23	And so what we are going to do right
24	to know. So I can't tell you that.	24	now is move beyond some asset-related
25	Well, it is because you see also in the	25	inquiry and move back to some other
	78		80
1	past, all this time that it was CCP, I am CCP's	1	questions.
2	number one enemy, and all this time that there were	2	THE INTERPRETER: Counsel, let me
3	so many cases, such as like the Department of	3	interpret that part first.
4	Justice, Higginbotham being bribed, and Elliott	4	Q. You indicated that your wife does not
5	Broidy being bribed, and they were also like trying	5	live with you. Do you have any children?
6	to kidnap me or arrest me or hurting me, and then	6	MR. GAVENMAN: Objection to form.
7	trying to suss out all the information about me and	7	You can answer.
8	my wife.	8	A. A son and a daughter.
9	And then, in fact, the questions	9	Q. What are their names?
10	that you are asking me were exactly what the CCP	10	A. Guo Quiang, Guo Mei.
11	wanted to know all the time online and getting	11	(Reporter clarification)
12	people to try to find out this information.	12	Q. Do either of your children live with
13	So -- and you did not talk anything	13	14 you?
14	about the case that is involving Cheng Shuiyan. And	14	A. No.
15	all this time you were just helping the CCP, sussing	15	Q. Are they over 18?
16	out my information and trying to hurt me and trying	16	A. Yes.
17	to harm me.	17	Q. Have you discussed your litigation,
18	And so for the safety sake, that	18	either in Nevada or this case with Mr. Cheng, with
19	is the least I can do to protect my family, I am	19	either of your children?
20	not answer your question. In fact, you are not	20	A. No.
21	even a hooligan counsel, lawyer --	21	Q. Have you discussed this case or the
22	Q. Thank you, stop. Please, stop,	22	underlying Nevada case with anyone else other than
23	please. You are pausing.	23	24 your attorneys?
24	A. (In English) I don't stop. I don't	24	A. No.
25	stop.	25	Q. Is there anybody in the

Transcript of Howan Kwok

21 (81 to 84)

Conducted on April 1, 2021

	81		83
1	Sherry-Netherland residence with you right now?	1	that our -- we are strategic partners.
2	A. The hotel security and then also the	2	Q. How were you strategic partners?
3	cleaning people, cleaning team of the building.	3	A. Well, we are partners in having the
4	Q. I'm assuming you have not discussed	4	common goal of eliminating the Chinese Communist
5	this case with any of them, correct?	5	Party and telling the truth to the west.
6	A. Yes. That's correct.	6	Q. Sorry, do you have a formal business
7	Q. And I apologize for this question, but	7	relationship with Mr. Bannon?
8	do you have a girlfriend or boyfriend with whom	8	A. No.
9	you may have discussed this case?	9	Q. Do you still communicate with
10	A. No.	10	Mr. Bannon?
11	Q. OK. Now, do you also -- it is my	11	MR. GAVENMAN: What possible
12	understanding you also lived on a boat this	12	relevance does any of this have --
13	summer?	13	A. Yes.
14	A. Yes.	14	MR. GAVENMAN: This is so far afield
15	Q. Did anybody live on the boat with you?	15	to anything relevant to this case. I've let
16	A. Yeah, there were many. Like there are	16	a whole bunch of questions go here, but you
17	eight or nine crews.	17	can't possibly tell me there is some reason
18	Q. Only crew members lived on the boat?	18	to ask these questions other than some
19	A. Well, there were guests, there were	19	harassing purpose.
20	guests of the owner. So sometimes they were --	20	If you have another purpose, we
21	and they were there -- too. I don't know.	21	can discuss it, but there is no way this
22	(Audio issue; reporter	22	is relevant to the case.
23	clarification)	23	Q. Are you still in communication with
24	THE INTERPRETER: OK, I'm done.	24	Mr. Bannon?
25	Q. Who were these guests?	25	A. Yes, we are still in communication,
	82		84
1	A. Well, I am not the owner of the boat.	1	1 yes.
2	So I can't -- I'm unable to answer that.	2	Q. How are you in communication?
3	Q. Did Steve Bannon live on the boat this	3	A. Phone calls.
4	past summer?	4	Q. Do you call him or does he call you?
5	A. For a period of time.	5	MR. GAVENMAN: Unless you agree with
6	Q. So you remember one person. Who else	6	the representation -- we can go off the
7	can you now remember?	7	record -- how any of this is possibly
8	A. Others.	8	relevant? You are just harassing the
9	Q. Who were these others?	9	witness. I will be happy to talk off line
10	A. I don't recall.	10	if there is any sort of basis why this is
11	Q. Why are you able to now recall	11	relevant, OK, we can proceed.
12	Mr. Bannon and not the others?	12	But you are just harassing him
13	A. I don't recall.	13	for things that are completely
14	Q. Did you discuss your litigation with	14	irrelevant. You have been doing that
15	Mr. Cheng with Mr. Bannon?	15	for most of the deposition. What
16	A. I don't recall.	16	does -- how he calls or doesn't call
17	Q. If we were to ask Mr. Bannon, would he	17	Steve Bannon have anything to do with
18	have any information about your lawsuits with	18	this case? Come on.
19	Mr. Cheng?	19	MR. WOLMAN: Actually, you may not
20	A. I don't know.	20	recall but your client testified that he
21	Q. What is your relationship with	21	doesn't take phone calls. So now he just
22	Mr. Bannon?	22	did.
23	A. Well, we had the common goal of	23	MR. GAVENMAN: He didn't testify that
24	eliminating the Chinese Communist Party and let	24	he doesn't take phone calls. He didn't
25	the public know about the truth of the virus. And	25	testify that he doesn't take phone calls.

Transcript of Howan Kwok

22 (85 to 88)

Conducted on April 1, 2021

	85		87
1 MR. WOLMAN: I'm exploring the prior 2 testimony.		1 and also it is a kind of a threat to, 2 like I said, the third-party who are 3 irrelevant to this case such as my 4 children, my son, my daughter, my family 5 and my friend.	
3 MR. GAVENMAN: That's not what he 4 said. That's not what he said and we are 5 talking about Steve Bannon, his relationship 6 with Steve Bannon. You are trying to find 7 out whether he takes phone calls? That's 8 the point of it? That's what you are doing? 9 You can ask that question.		6 You see a lot of such deposition 7 information will be posted online 8 subsequently and posing great threat to 9 their safety and, in fact, that has been 10 done a lot by Cheng Shuiyan himself.	
10 But his relationship with Steve 11 Bannon and his partnership, things like 12 that -- that's what you have been 13 asking, which is not about phone calls, 14 you haven't made a representation why 15 this is relevant so if you want to ask a 16 question about phone calls, go right 17 ahead. But don't mischaracterizes 18 testimony. And you can ask that 19 question. That's enough with Steve 20 Bannon. It this has no possible 21 relevance.		11 So if afterward, any of this 12 information is going to be posted online 13 about, for example, my clothes, my way 14 of life and then my family, my friends, 15 it's really a form of serious threat to 16 the safety of the irrelevant third-party 17 to this case.	
22 MR. WOLMAN: I thought you said we 23 weren't doing speaking objections.		18 And I strongly request a phone 19 call to the judge to let him know or her 20 know that this is a threat to me and my 21 friend.	
24 MR. GAVENMAN: I said I would be 25 happy to go off the record. As I said that,		22 And the thing also that you see, 23 the questions surrounding my clothes, my 24 way of life, my wife, my son, my 25 daughter and Mr. Bannon, this is really	
	86		88
1 you went forward to not going off the 2 record. I responded to what you said. I 3 welcome going off the record?		1 the circle of my life and this is the 2 map, the entire map of my life. And to 3 my safety, if you can go online to 4 check, that is exactly the questions the 5 line of information the CCP always 6 trying to describe and depict and 7 collect.	
4 THE WITNESS: Hold on. We are -- 5 hang on. May I actually make a 6 recommendation, suggestion to my counsel, 7 Jeff?		8 So with this line of questions, 9 to me, it is a seriously exposing my 10 person to great danger and great threat. 11 That is why I feel like this kind of 12 question, the line of question is 13 actually bearing malice and I wish to 14 make this known to the judge and I wish 15 my counsel would help me to contact the 16 judge and let them know that.	
8 MR. GAVENMAN: OK.		17 MR. GAVENMAN: And I agree. And I 18 think we have gone to the line of 19 harassment. Any questions about Bannon, it 20 is really not relevant, who is living on the 21 boat, it's really not relevant.	
9 THE WITNESS: Actually, I want to 10 tell you that I am seriously uncomfortable, 11 uneasy because I feel like the questions 12 they are posing to me has not been relevant 13 to the case of Cheng Shuiyan and it is 14 really that the questions were asked of me 15 were about my friends, my family, and it is 16 something that the Chinese Communist Party's 17 line of questions.		22 You represented to the judge we 23 would move on to the Nevada litigation. 24 If you don't, if you keep on this line 25 of questioning, I will go to the judge	
18 So I am feeling uneasy and 19 uncomfortable because I feel like it is 20 already posing threat to my own safety and 21 the safety of my friends and family.			
22 Is it possible to actually even 23 call the judge about that to tell them 24 that I am very uneasy about that?			
25 So it is a kind of abuse to me			

Transcript of Howan Kwok

23 (89 to 92)

Conducted on April 1, 2021

	89		91
1	and go right back to her.	1	A. I don't recall.
2	This is completely irrelevant.	2	Q. Have you ever been employed in the
3	you know it. You told the junk we would	3	United States?
4	go to the Nevada litigation, let's go to	4	MR. GAVENMAN: On advice of counsel,
5	that please.	5	Mr. Guo declines to respond to the question
6	MR. WOLMAN: Can the reporter read	6	invoking his rights under the Fifth
7	back my last question.	7	Amendment of the U.S. Constitution.
8	(Record read)	8	Q. Are you refusing to answer?
9	MR. WOLMAN: Thank you.	9	A. Yes.
10	Q. Mr. Kwok, do you call Mr. Bannon or	10	Q. You said you met Mr. Cheng once. When
11	does he call you?	11	11 was that?
12	A. I don't recall.	12	A. It will be around October 2017.
13	Q. What device do you use for these	13	Q. And what were the circumstances of
14	telephone calls?	14	14 that meeting?
15	A. I don't recall.	15	A. So it was at the time that, in fact,
16	Q. Do you call him from the phone that	16	16 that there were a number of people also present
17	17 you showed us earlier?	17	17 including his personal employee at the time, Lude
18	A. No.	18	18 Wang Ding Gang, and then other people name Yang
19	Q. What is your highest level of	19	19 Jian Li and the Han Lian Chao.
20	20 education?	20	We all met in Washington DC at K
21	A. Middle school.	21	Hamlet Hotel and he wanted to -- wanted me to sign
22	Q. When was the last time you held a job?	22	and to support his anti-Chinese Communist Party
23	A. I don't recall.	23	campaign and he told me that he respected my
24	Q. What was your last paid employment	24	effort and that he showed his encouragement to my
25	25 job?	25	anti-CCP activities and -- and then also he asked
	90		92
1	MR. GAVENMAN: On advice of Mr. Guo's	1	me to sign a lot of newspapers.
2	counsel, Mr. Guo declines to respond to the	2	Q. And after that meeting, did you have
3	question invoking his rights under the Fifth	3	any direct communications with him after that?
4	Amendment of the U.S. Constitution, and	4	MR. GAVENMAN: Objection to form.
5	Mr. Wolman, we have established we are not	5	A. No.
6	going to go any further with income	6	Q. Do you recall making a video about
7	questions. So this --	7	Mr. Cheng?
8	MR. WOLMAN: Let me ask this one, let	8	A. I made a video on the 5th of June
9	me ask this one.	9	2018.
10	Q. What was the last job that you held	10	Q. And why did you make that video?
11	11 that you won't invoke the Fifth Amendment	11	A. So it was in 2018, March and April,
12	12 privilege for?	12	12 Wang Ding Gang who is Cheng Shuiyan's employee and
13	MR. GAVENMAN: I need to object -- to	13	13 together with Cheng Shuiyan they created a media
14	the extent you can answer that based not on	14	14 called the Voice of Freedom. And then on YouTube,
15	an attorney/client communication, you can	15	15 that they created a lot of the video supporting me
16	answer.	16	16 and then also the corruptions of the Chinese
17	To the extent it would reveal an	17	17 communist party.
18	attorney/client communication that would	18	However, by the end of March to
19	include your understanding of the Fifth	19	April, Wang Ding Gang told me that there was
20	Amendment privilege, then please do not	20	someone from Beijing with a government background
21	answer revealing any attorney/client	21	21 visiting Cheng Shuiyan and representing him
22	communications.	22	22 expensive gifts such as expensive Moutai and then
23	A. I actually don't recall.	23	23 telling him not to support me. And so not to
24	Q. What is the job you have held for the	24	24 support me on the platform of Voice of Freedom.
25	25 longest period of time?	25	So is that he will -- Cheng

Transcript of Howan Kwok

24 (93 to 96)

Conducted on April 1, 2021

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1 Shuiyan also will be given like millions of
 2 dollars of a gift as well.
 3 And also, Wang Ding Gang also
 4 told me that, you know, the Beijing person said
 5 Cheng Shuiyan had a criminal case in Mongolia in
 6 China and he has defrauded his business partner of
 7 the amount of that hundreds of millions renminbi.
 8 And if Cheng Shuiyan were to agree to cooperate
 9 with Mongolian police and Chinese government, they
 10 can make that case to go away.

11 Lude also said that if he,
 12 himself not to help Cheng Shuiyan, and Cheng
 13 Shuiyan is going to replace him with another
 14 employee, Marco, in this exchange.

15 And then also because that he was
 16 given by the Chinese government that hundreds of
 17 millions of renminbi, so therefore, that he was
 18 able to purchase his hotel in Las Vegas.

19 Not only that, Cheng Shuiyan had
 20 -- make alliance with some people in Japan and
 21 Canada and establish some kind of human right
 22 alliance and then talking about to support the
 23 oversee the stability and harmony and so on, so
 24 forth and declare that I was a rural person that
 25 has defrauding and tricks -- tricking and acting

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 1 together with the Chinese government and spreading
 2 that this kind of malicious rumor about me.
 3 So Lude at that point thought that Cheng
 4 Shuiyan went altogether crazy and changing the right
 5 to the wrong and so that he left Cheng Shuiyan. So
 6 Cheng Shuiyan replace Lude with another employee
 7 called Marco.

8 And so they were creating
 9 programs all together just targeting at attacking
 10 me and spreading malicious rumor about me and so
 11 that is when at that time, I decided to retaliate
 12 by telling Cheng Shuiyan was actually a criminal
 13 conspiring with the Chinese government, in cohort
 14 with them and so that is why I make that video.

15 Q. What did you do to verify anything
 16 that Lude told you?

17 A. So of course I did. You see, first of
 18 all, what Lude said was factual, and so because
 19 later on, that Marco was put into the position to
 20 replace Lude and also that platform, you know, the
 21 Freedom, Voice of Freedom, it was so proprietary
 22 of -- this is of Cheng Shuiyan.

23 And so a lot of the people that
 24 they were interviewing during that program, they
 25 were my supporters in China and all over the

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 1 world, and several of those people, after they had
 2 been interviewed, they were arrested and they
 3 disappeared, and in fact, those people, before
 4 they disappeared, they told me that they were
 5 being threatened by the Mongolian police and also
 6 that you see that Cheng Shuiyan were telling them
 7 that they were CCP internal information and
 8 telling them the information that is to attack me.

9 So all of this is proven in line with
 10 what Lude told me. Marco told me -- Marco told
 11 me --

12 Q. Not responsive to my question. Strike
 13 that.

14 (Simultaneous crosstalk)

15 THE INTERPRETER: The witness is
 16 saying something and counsel is also saying
 17 something.

18 MR. WOLMAN: There is no question,
 19 there is no question.

20 THE INTERPRETER: I haven't finished
 21 he said.

22 A. Then also, what the videos or the
 23 program they created by Marco and then with all
 24 these attack, verbal attack that they have made of
 25 me is exactly the same as Cheng Shuiyan and the

96
 1 program, it's exactly the kind of words and line
 2 of attack. So all of that was like just like what
 3 Lude has said. So it has been proven to me.

4 Q. Mr. Guo, please stop.

5 A. So as --

6 Q. He is not answering the question. Not
 7 responsive.

8 (Simultaneous crosstalk)

9 THE INTERPRETER: OK.

10 And the witness also said that
 11 because Lude and Marco, they were all
 12 Cheng Shuiyan's employees so that what
 13 he said can be trusted. Personal
 14 employee.

15 Q. What evidence do you have that
 16 Mr. Cheng defrauded Hong Kong businessmen 100
 17 million yuan?

18 A. So you see that the counsel -- the
 19 lawyer who was handling Cheng Shuiyan's case in
 20 mainland China had actually been in contact with
 21 me before and giving me a large amount of the
 22 documents denoting, describing the fraudulent
 23 behavior, the criminal behavior of Cheng Shuiyan
 24 in defrauding his business partner in mainland
 25 China and including the one in Hong Kong.

Transcript of Howan Kwok

25 (97 to 100)

Conducted on April 1, 2021

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1 And in fact, his Hong Kong
 2 partner also had in contact with me and giving me
 3 such documents as well and then all those
 4 documents and the information I stored in the
 5 computer and the cell phone before and which were
 6 hacked and all been destroyed. Otherwise, I would
 7 have them in my cell phone and my computer.

8 And in fact, including some kind
 9 of bank documents and also his criminal record --
 10 documents and records in mainland China and his
 11 lawyer provided them to me and I have -- I had all
 12 of them.

13 Q. OK, what was the name of this lawyer?

14 A. And I don't recall it now.

15 Q. What was the name of this Hong Kong
 16 business partner?

17 A. I don't recall that now either.

18 Q. When did this alleged hack take place?

19 A. It was after Cheng Shuiyan and his
 20 employee, personal employee, Marco, made the
 21 attack on me on the platform Geteer, and since
 22 then, my cell phone was hacked daily. In fact,
 23 really daily.

24 In fact, it was from May 2018 and August
 25 2018, Cheng Shuiyan and his personal employee,

1 that would be the cell phone that was hacked which
 2 stored the documents of Cheng Shuiyan.

3 And also at the time, I had a
 4 Twitter account as well, and when that happened, I
 5 tweeted out and sending out messages that telling
 6 my phone was hacked, the documents were hacked,
 7 and so the Twitter message and videos, I send the
 8 message out.

9 Q. When did you throw out these phones?

10 A. Around August or September 2018. I'm
 11 not saying that I dispose all the phones within a
 12 day. Well, sometimes here, sometimes there.
 13 Sometimes -- hang on.

14 So that I sometimes this day,
 15 sometimes later, sometimes earlier, it's because
 16 those cell phones, once they were hacked --
 17 sometimes they were just being hacked, but
 18 sometimes the entire phone was on fire.

19 So to keep all these phones here would
 20 really be like threatening so that's why I just
 21 disposed of them.

22 Q. I'm a little confused because isn't it
 23 true that the HBO piece aired on November 15,
 24 2017, months before the video of May 2018 --
 25 sorry, June 2018?

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1 Marco, being -- attacking me and because of that
 2 attack and I changed my cell phone was hacked either
 3 every day or every other two days. So basically at
 4 that time, I need to change cell phone nearly every
 5 day.

6 Q. And the documents were on this cell
 7 phone and the computer, you say?

8 A. Yes, it was on that cell phone.

9 Q. And where is that cell phone now?

10 A. All thrown away. Because I could not
 11 open them anymore and I could not use them
 12 anymore.

13 Q. And where is that computer now?

14 A. I did not use computer. I was
 15 actually just using cell phone. I was talking
 16 about just cell phone.

17 Q. How did these documents get to your
 18 cell phone?

19 A. At the time, it was through WhatsApp
 20 and MSN Messenger.

21 In fact, that HBO had made an
 22 interview, had interviewed me, and then during
 23 that interview is -- you can check on those
 24 videos, during that interview, I placed on the
 25 table 80 of those cell phone and amongst which,

1 A. So what -- maybe there is some mistake
 2 and I did not say that the cell phone was hacked
 3 in those cell phone displayed in the HBO
 4 interview.

5 I merely said that during that
 6 interview, I have displayed the cell phones that
 7 have -- so many of the cell phones being hacked.

8 So I was just saying that my cell phone
 9 was already hacked during that time, but the peak of
 10 the hacker was happening in 2018 between May and
 11 August.

12 Q. OK. And you say you probably disposed
 13 of the phone that had the documents regarding
 14 Mr. Cheng at some point in August or September of
 15 2018, correct?

16 A. Yes.

17 Q. And at what point --

18 A. Let me think, let me think.

19 THE INTERPRETER: Counsel, do you
 20 mind if I clarify with the witness one word
 21 that I'm not quite sure I caught?

22 MR. WOLMAN: Sure.

23 A. So the thing is that you see, even
 24 though those documents were destroyed, however, a
 25 lot of such documents had already been tweeted on

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Transcript of Howan Kwok

26 (101 to 104)

Conducted on April 1, 2021

<p>101</p> <p>1 to the network, on the Geteer platform. So if you 2 were to make a such, you can find those documents.</p> <p>3 Q. When was it you first decided to sue</p> <p>4 Mr. Cheng?</p> <p>5 A. So I really cannot quite recall from 6 June, July, August, you know, during that period 7 of time, he made serious attacks towards myself 8 and my family, full of malice and including he 9 himself, his employee, Marco, every day just 10 incessantly just creating attack towards me. It 11 has brought so much harm and so much destruction 12 to my life and my family.</p> <p>13 So I really cannot recall exactly when 14 that I decide to sue him, perhaps in May or August, 15 around that time.</p> <p>16 Q. When did you hire attorney Christopher</p> <p>17 Rose and/or the law firm of Jolley, Urga,</p> <p>18 Woodbury, Holthus & Rose?</p> <p>19 A. So I must also clarify that, you know, 20 I actually don't remember the names, the names of 21 the counsel or the names of the firm. All these 22 names that you just talked about, I have no 23 concept whatsoever.</p> <p>24 But do you mind if I go to the 25 bathroom?</p>	<p>103</p> <p>1 A. I don't have any recollection.</p> <p>2 Q. Who told you to dispose of the phones?</p> <p>3 A. Myself.</p> <p>4 Q. Did anybody ever tell you not to</p> <p>5 dispose of phones?</p> <p>6 A. I don't recall.</p> <p>7 Q. Do you have any awareness of an</p> <p>8 obligation to preserve documents in anticipation</p> <p>9 of litigation?</p> <p>10 MR. GAVENMAN: Objection.</p> <p>11 To the extent you can answer that</p> <p>12 without it being based on</p> <p>13 attorney/client communication, you're</p> <p>14 welcome to answer it, but please don't</p> <p>15 reveal attorney/client communications.</p> <p>16 A. My answer is no.</p> <p>17 Q. Is there any reason nothing about your</p> <p>18 video or these documents were mentioned in your</p> <p>19 August 9, 2018 complaint against Mr. Cheng in</p> <p>20 Nevada?</p> <p>21 MR. GAVENMAN: Again, I strongly</p> <p>22 caution you not to reveal any</p> <p>23 attorney/client communications.</p> <p>24 To the extent any understanding</p> <p>25 comes from attorney/client</p>
<p>102</p> <p>1 Q. That's fine.</p> <p>2 Wait, strike that, let's answer</p> <p>3 the question. When did you hire the law firm that</p> <p>4 filed the Nevada suit?</p> <p>5 A. I cannot recall the specific time.</p> <p>6 Q. OK, we can take a five-minute bathroom</p> <p>7 break.</p> <p>8 (Recess; 2:31 p.m. to 2:40 p.m.)</p> <p>9 Q. Mr. Guo, do you ever attempt to</p> <p>10 recover the data from any of these phones you</p> <p>11 claim were hacked?</p> <p>12 A. Well, it was never recovered</p> <p>13 successfully.</p> <p>14 Q. Who attempted to recover it?</p> <p>15 A. I don't recall.</p> <p>16 Q. Did you ever submit what -- these one</p> <p>17 or more phones to a professional forensic company</p> <p>18 for recovery?</p> <p>19 A. I don't recall.</p> <p>20 Q. Did your Nevada attorneys assist you</p> <p>21 in attempting to get any data recovery from this</p> <p>22 device or devices?</p> <p>23 A. I don't recall.</p> <p>24 Q. Well, what do you recall about the</p> <p>25 recovery efforts for the data on the phones?</p>	<p>104</p> <p>1 communications, you should not reveal</p> <p>2 them.</p> <p>3 To the extent you can answer it</p> <p>4 without revealing, you can.</p> <p>5 A. No.</p> <p>6 Q. You mentioned the use of MSN</p> <p>7 Messenger. What is the Microsoft account</p> <p>8 affiliated with that?</p> <p>9 MR. GAVENMAN: Objection to form.</p> <p>10 A. Well, I have over a hundred of a cell</p> <p>11 phone. I really cannot recall any of those.</p> <p>12 Q. Are you aware that --</p> <p>13 A. So when I'm talking about hundreds of</p> <p>14 cell phone I use, that would be the situation to</p> <p>15 the period of August of 2018. In fact, I would</p> <p>16 have much more of the cell phone use after August</p> <p>17 2018.</p> <p>18 Q. How is it possible that you had an MSN</p> <p>19 messenger account without having an e-mail</p> <p>20 address?</p> <p>21 MR. GAVENMAN: Objection to form,</p> <p>22 foundation.</p> <p>23 A. Well, I only know when I have a cell</p> <p>24 phone, then there is a cell phone number so that</p> <p>25 would be MSN, this function that I can use. I</p>

Transcript of Howan Kwok

27 (105 to 108)

Conducted on April 1, 2021

105 1 don't know that MSN is having any connection with 2 e-mail. 3 Q. Who sets up your cell phone each time 4 you get one? 5 A. I don't recall. 6 Q. Can you recall anybody who has ever 7 helped you set up a cell phone? 8 A. I don't recall. 9 Q. You have an Apple iPhone there? 10 A. Yes. 11 Q. What is the Apple ID associated with 12 that iPhone? 13 A. I don't know. 14 Q. You just got that a few days ago, 15 correct? 16 A. Yes. 17 Q. Do you still have it in front of you 18 or with you in the room? 19 A. No, it's in another room. 20 Q. OK. We have had a few breaks so far. 21 Did you speak with anybody during those breaks? 22 A. No. 23 Q. Have you sent any communications with 24 anybody during any of the breaks that we have had 25 today?	107 1 electronic copy of the original complaint filed in 2 Nevada by you against Mr. Cheng on August 9, 2018. 3 We can scroll through it. 4 Did you read this document either 5 in English or as translated before it was filed? 6 A. A simple translation, yes, someone had 7 briefly translated that for me. 8 Q. Who translated it? 9 A. I cannot recall. 10 Q. Were they affiliated with the Nevada 11 law firm, who translated it? 12 A. I don't know. 13 Q. How did you make the acquaintance of 14 this translator? 15 MR. GAVENMAN: Objection, form, 16 foundation. 17 A. Well, I don't know this translator. 18 Q. Now, paragraph 101 on page 13 states, 19 "Cheng does not know Guo personally." 20 You testified, however, that the 21 two of you had met back months before this 22 complaint was filed, correct? 23 A. You have misunderstood because what it 24 says here, Cheng does not know Guo personally 25 meant before, long before we met personally, long
106 1 A. No. 2 Q. Did you read the Nevada complaint 3 before it was filed? 4 And actually strike that. I'm 5 going to upload a document. 6 MR. WOLMAN: It should be going. 7 TECHNICIAN: Make sure you hit -- 8 MR. WOLMAN: I did. 9 TECHNICIAN: OK. Some people miss 10 that. 11 MR. WOLMAN: The progress bar is not 12 moving for some reason. 13 THE INTERPRETER: I was explaining to 14 the witness that we are waiting for the 15 document upload. 16 MR. WOLMAN: I just uploaded to the 17 Zoom. Can you use that? 18 TECHNICIAN: Yes, absolutely. One 19 moment, please. 20 Q. I am marking as Exhibit 3 and 21 displaying the document on the screen. 22 (Exhibit 3, document entitled 23 "Complaint" marked for identification, 24 as of this date.) 25 Q. Mr. Guo, I would represent this is an	108 1 before that he accused me of being rapist and 2 killers, I had to -- this millions and millions of 3 dollars of deal with Xi Jinping and betraying the 4 1.4 billion of Chinese people, we did not know 5 each other. 6 So I emphasized that before he 7 maliciously insulted me, threatening me, harming 8 me and before we met each other, we -- did he not 9 know me. 10 Q. I am sorry, when did my client call 11 you a rapist? 12 A. Let me see, he started to have his 13 personal employee Marco in March and then started 14 out from April, May and June, all the way to 15 August, they started to maliciously viciously 16 attacking me verbally and him, himself and his 17 personal employee, Marco, and kept calling me on 18 their platform that I was the rapist, I was, you 19 know, a peasant, I was a liar, I was whatever and 20 he -- they were making such threat to me and the 21 safe -- threatening my safety and my family's 22 safety and we were constantly living in -- under 23 this kind of a threat and fear. 24 Q. Move to strike, not responsive. 25 When did my client call you a

Transcript of Howan Kwok

28 (109 to 112)

Conducted on April 1, 2021

109 1 rapist? 2 A. Well, the thing is that he and his 3 employee, Marco, and all the time that on -- 4 saying that on Freedom China or Twitter, calling 5 me that liar. But I cannot recall exactly when 6 that Cheng Shuiyan have called me that, and he and 7 his personal employee definitely did call me that 8 starting from May or -- they did.	111 1 A. So I actually cannot be sure that it 2 was Ria Ma who was actually suing me for that. 3 You see, this case was brought 4 forward right after I had made the broadcasting, 5 the whistleblower broadcasting in 2017, and then 6 on the same day, the notice from the Interpol had 7 been issued for me, for me, my person, and then 8 after that, this case was brought up.
9 Q. So you are saying -- 10 A. He did. He did, I have -- I haven't 11 finished, sorry, Counsel.	9 But the thing is, throughout this 10 case, I have not seen Ria Ma or the documents or 11 the information was brought forward by the police 12 in mainland China. Ria Ma had never appeared or 13 never shown in any way.
12 Well, and -- 13 (Simultaneous crosstalk)	14 So I believe that this is a 15 fabricated case and brought forward by the Chinese 16 Communist Party police and that is why Cheng 17 Shuiyan was so very familiar with this case.
14 Q. First of all, I don't need that 15 translated.	18 But Ria Ma has never appeared and 19 in fact, we have been trying to look for her and 20 trying to get her to be the witness for this case 21 but she has never shown.
16 MR. GAVENMAN: You are going to have 17 that translated. He is going to respond.	22 Q. That case is still ongoing, correct?
18 MR. WOLMAN: He is not responding to 19 anything.	23 A. Yes. We -- I should say that we are 24 in the middle of looking for Ria Ma and we have 25 been looking for her for many months.
20 MR. GAVENMAN: He most certainly is.	110
21 MR. WOLMAN: He is filibustering, he 22 is filibustering.	112
23 A. I have a -- I have answered you, so 24 that you must let me translate that. And so -- 25 and because I have answered your question.	1 Q. To be clear, has anybody else accused 2 you of sexual assault?
2 By the end of March and in June 3 and May and April, his lawyer, from Yingnan had 4 been -- had been calling and telling me that Cheng 5 Shuiyan had been already accusing me of being a 6 spy, a rapist and all that.	3 THE INTERPRETER: Sorry, I hear two 4 voices just now.
6 And also including Lude and he 7 privately told me that Cheng Shuiyan personally 8 privately calling me rapist and liar and then also 9 like threatening and just, you know, in fact, it's 10 on social media as well.	5 Q. To be clear, has anybody other than 6 Ria Ma accused you of sexual assault?
11 And then he actually naturally privately 12 make the allegation of me being a rapist openly. In 13 fact, he also said that I was a rapist and I needed 14 to be deported and he tweeted that, too.	7 A. No. 8 (Simultaneous crosstalk)
15 And on the Twitter, he claimed 16 that he had written to DOJ and his personal 17 employee, Marco, also written to the DOJ that I 18 was a rapist and needed to be deported, and so the 19 Chinese government can, you know, just take care 20 of me and it was all done privately and openly as 21 well.	9 Q. As to -- there is no question posed. 10 There is no question posed.
22 Q. Since you seem to have opened the 23 door, were you sued for sexual assault?	11 A. That is -- that is why the -- I need 12 to sue Cheng Shuiyan because why would he know 13 that there was such a case, and then for bringing 14 forward this case and then brought up this case is 15 completely full of malice and vicious --
24 A. Yes. 25 Q. And is that a suit by Ria Ma?	16 viciousness and then trying to insult me, trying 17 to frame me and then it was trying to threaten me 18 and ruin me.
19 Q. And none of those allegations appear 20 though in Exhibit 3, do they?	19 Q. And none of those allegations appear 20 though in Exhibit 3, do they?
21 MR. GAVENMAN: Objection, form.	21 MR. GAVENMAN: Objection, form.
22 A. That is why I need to, again, 23 emphasize to you -- that is why I need to clarify 24 with you when you're talking about Exhibit 3, you 25 see all this document were in English and I don't	

Transcript of Howan Kwok

29 (113 to 116)

Conducted on April 1, 2021

	113		115
1 understand English, I cannot read English.		1 that in March, Cheng Shuiyan met with someone from	
2 Well, that is, that is why that I		2 mainland China and he was actually a Mongolian	
3 need to tell you that, because a lot of the		3 police.	
4 evidence that had not been appeared on this, in		4 So he was drinking Moutai alcohol	
5 this complaint and also that had not been brought		5 with this person and given hundred million --	
6 forward in the case of Nevada's lawsuit and that		6 millions of dollars by this person and just so	
7 is exactly why that they have -- there were two		7 that he can defame me and insult me.	
8 lethal fatal made for that case and as a result,		8 All of that was actually recorded	
9 we lost that lawsuit.		9 and told by Lude and these are fact, factual as	
10 One is that Lude was -- Lude was		10 just a piece of steel metal, and the only person	
11 and that's Wang Ding Gang, and also Marco, who was		11 who would think that I am the enemy and I am a bad	
12 the personal employee of Cheng Shuiyan, they made		12 person is the Chinese Communist Party. they are	
13 this defamation insult of me and that was because		13 the only people who would consider me as enemy or	
14 they were instructed and told by Cheng Shuiyan.		14 people working with them would consider me an	
15 And so Cheng Shuiyan would need to be responsible		15 enemy.	
16 for all the attacks and the insult and defamed		16 So I can tell you I know that	
17 remarks that they have made of me, and that has		17 that Cheng Shuiyan was very wealthy, but the thing	
18 not been included in this case as the evidence.		18 is that the money that he got came from defrauding	
19 And also including quite a lot of		19 people in China and being defrauding his business	
20 information including in the cell phone and being		20 partner in China and coming from ill-gotten means.	
21 lost and all that, I had not been included in any		21 Q. And this information you got from a	
22 of this complaint. And that is why that we have		22 person named Lude who was losing his job, correct?	
23 lost it. And why that we have used a new lawyer		23 MR. GAVENMAN: Objection to form.	
24 and to open this case again.		24 A. OK. So Lude did not lose his job.	
25 And that also includes the fact		25 Lude gave up his job because he did not want to be	
	114		116
1 that we have only -- I have only 15,000 of the		1 conspired with the CCP.	
2 damage from him. It is a very low amount.		2 And since that he gave up his job	
3 The reason that we only sought		3 with Cheng Shuiyan, his life is even better. He	
4 such a low amount is because it was only to try to		4 was doing so much better with his anti-Chinese	
5 stop him, stop him from making -- continue of		5 Communist Party activities.	
6 making malicious insult and vicious rumor that is		6 And also I must clarify, the	
7 very destructive to me and my family and also		7 information did not come from Lude. As I stated,	
8 spreading all this deception online about me and		8 the information come from Cheng Shuiyan -- the	
9 created by him and his personal employee, Marco,		9 lawyer from -- the Yingnan lawyer who is also the	
10 and proven by his conversations together with		10 Mongolian police, the intelligence police, and	
11 Lude.		11 also that the -- to the Mongolian police	
12 And all of that had not been included		12 interviews of those people that who had been	
13 into that complaint made to the Nevada case and that		13 disappeared, who had been arrested after they were	
14 is why that we are pursuing that.		14 supportive of me and they were arrested by those	
15 We hope that with this		15 police, it come from those people as a source.	
16 opportunity that we can provide more fact to the		16 Not from Lude.	
17 judge and then for this case and so that we can		17 Q. And other than Lude, you don't have	
18 know that Cheng Shuiyan was in cohort with the CCP		18 the names today remembering any of these other	
19 and conspired with them and spreading destructive		19 sources, do you?	
20 insult of me and creating malicious rumors about		20 A. If you wish to search for those names	
21 me that is very destructive.		21 and, you know, if you have time, those names were	
22 Q. Do you have any -- excuse me, my turn.		22 online and you can actually find them.	
23 Do you have any actual evidence		23 Q. Can you find them?	
24 that my client is working with the CCP?		24 A. I can try.	
25 A. OK, so you see that, as I was saying,		25 Q. Excellent. Will you provide them with	

Transcript of Howan Kwok

30 (117 to 120)

Conducted on April 1, 2021

	117		119
1 your counsel to supplement the initial 2 disclosures?		1 repeat the interpreting?	
3 A. I cannot guarantee but I will try.		2 MR. WOLMAN: Yes.	
4 Q. When do you think you can get us that 5 information by?		3 A. I borrowed from them.	
6 A. I cannot guarantee. As I said, I 7 cannot promise. So I cannot tell you what -- 8 when.		4 Q. Is there an agreement memorializing 5 this borrowing?	
9 Q. Now, if you wanted to, you could have 10 any of your legal pleadings translated for you, 11 correct?		6 A. No.	
12 A. You mean by whom?		7 Q. Do you have to pay them back?	
13 Q. Did you have a certified translator 14 translate any legal pleading for you?		8 MR. GAVENMAN: On advice of counsel, 9 Mr. Guo declines to respond to the question 10 invoking his rights under the Fifth 11 Amendment of the U.S. Constitution.	
15 A. Our lawyer was doing a fine job.		12 Q. How much did you borrow?	
16 Q. How did you know your lawyer was doing 17 a find job only now to find out there was 18 information not included?		13 MR. GAVENMAN: On advice of counsel, 14 Mr. Guo declines to respond to the question 15 invoking his rights under the Fifth 16 Amendment of the U.S. Constitution.	
19 A. So my -- what I meant was that usually 20 lawyer would do a good job. It's just of course 21 that lawyer, that particular lawyer did not do a 22 good job. But usually lawyers can be relied upon.		17 Q. Was there a term of interest in this 18 borrowing arrangement?	
23 Q. If you wanted to, you could have 24 anything translated, correct?		19 MR. GAVENMAN: Objection to form.	
25 A. Of course.		20 Foundation.	
	118		120
1 Q. Who paid for the litigation in Nevada?		1 Amendment of the U.S. Constitution.	
2 A. Golden Spring.		2 Q. Did Golden Spring New York -- strike 3 that.	
3 Q. Why?		4 If you had won your case against 5 Mr. Cheng in Nevada, would Golden Spring New York 6 have been entitled to any portion of that 7 recovery?	
4 MR. GAVENMAN: Wait. On the advice 5 of Mr. Guo's counsel, Mr. Guo declines to 6 respond to the question invoking his rights 7 under the Fifth Amendment of the U.S. 8 Constitution.		8 MR. GAVENMAN: On advice of counsel, 9 Mr. Guo declines to respond to the question 10 invoking his rights under the Fifth 11 Amendment of the U.S. Constitution.	
9 MR. WOLMAN: Jeff, that's not an 10 asset-related question. That is a 11 motivation.		12 Q. Have you borrowed from Golden Spring 13 New York to finance any other litigation?	
12 MR. GAVENMAN: We are invoking the 13 Fifth. We have already been through this. 14 We had 20 questions about why they pay for 15 stuff. I don't know why you would think 16 there would be a different answer here.		14 MR. GAVENMAN: On advice of counsel, 15 Mr. Guo declines to respond to the question 16 invoking his rights under the Fifth 17 Amendment of the U.S. Constitution.	
17 THE WITNESS: Counsel, I just need to 18 go to close my window because the window is 19 open at the moment. There is a gust of 20 wind. So I need to close the window. Is it 21 all right if I go to do that?		18 Q. Subsequent to your disappointment with 19 the prior Nevada law firm, have you done anything 20 to ensure that all documents in your litigation 21 with Mr. Cheng are translated for you?	
22 MR. WOLMAN: Sure.		22 A. No.	
23 Q. Did you ask Golden Spring to pay for 24 the Nevada litigation?		23 MR. WOLMAN: Let's, Juliet, let's 24 take out document number 003.	
25 THE INTERPRETER: Counsel, may I		25 TECHNICIAN: Yes, marking as Exhibit	

Transcript of Howan Kwok

31 (121 to 124)

Conducted on April 1, 2021

	121	123
1 4. And the document is on the screen. 2 (Exhibit 4, Complaint and Jury 3 Demand marked for identification, as of 4 this date.) 5 Q. Mr. Guo, I will represent that this is 6 the complaint and jury demand in this case. 7 Did you have it translated for 8 you? 9 A. At the time that I had a voice 10 simultaneous interpretation of this document for 11 me, a brief interpretation, but I do not recall 12 there was translation.	1 identification, as of this date.) 2 Q. Mr. Guo, I will note these are the 3 initial disclosures filed by -- served by your 4 attorney in this case. 5 Did you ever have this document 6 translated? 7 A. The thing is that -- allow me to 8 emphasize again, like this is an English document, 9 and you know, if you ask me any of the English 10 documents just posted in front of me on the screen 11 and to scroll down and let me see, I really cannot 12 be sure that whether I have seen it or not or 13 translated the document or not. I really cannot 14 be sure. 15 Now, if you were to give me time and put 16 the document in front of me and let me really read 17 in detail and try to remember, perhaps I can. But 18 just post in front of me scrolling, I just cannot be 19 sure.	
13 MR. WOLMAN: Let's pull up the 14 document that starts with 004. 15 TECHNICIAN: Marking as Exhibit 5., 16 and the document is on the screen. 17 (Exhibit 5, Defendant Wengui 18 Guo's Answer to the Complaint marked for 19 identification, as of this date.) 20 Q. I would represent this is the answer 21 to the complaint filed by Mr. Gavenman in this 22 case. 23 Did you have this document translated 24 for you? 25 A. Yes.	20 MR. WOLMAN: OK. Let's go to 006. I 21 know I'm jumping around Juliet, sorry. 22 TECHNICIAN: No problem at all. 23 Marking it as Exhibit 7 and 24 Exhibit 7 is on the screen. 25 (Exhibit 7, Defendant Wengui	20 MR. WOLMAN: OK. Let's go to 006. I 21 know I'm jumping around Juliet, sorry. 22 TECHNICIAN: No problem at all. 23 Marking it as Exhibit 7 and 24 Exhibit 7 is on the screen. 25 (Exhibit 7, Defendant Wengui
1 Q. If you did not have the prior 2 document, which was Exhibit 4, fully translated, 3 how were you able to assist in advising your 4 company whether or not to admit or deny certain 5 facts? 6 MR. GAVENMAN: I caution you not to 7 reveal any attorney/client communications in 8 this answer. To the extent you can answer 9 without revealing them, you are free do so. 10 A. I must clarify. You know the document 11 that you showed me previously, I actually cannot 12 be sure whether there were any words of 13 translation. There may have, there may not have. 14 I just cannot be sure. 15 And including this one also. I 16 mean, that -- I may have seen it but I may not 17 have either. 18 So any of these documents in English, I 19 just wouldn't know for sure.	122	124 1 Guo's Objections and Responses to 2 Plaintiff Logan Cheng's Second Revised 3 First Set of Requests for Production of 4 Documents marked for identification, as 5 of this date.) 6 Q. This is a -- the document is a 24-page 7 document that is a your responses to our second 8 revised first set of requests for production. 9 As the technician scrolls through 10 it, you will see there are over a 100 document 11 requests, of these numbered, many of which have 12 since been omitted. 13 Do you recall seeing a translated 14 version of that, of any document with over 100 15 requests? 16 A. Yes, I recall. 17 Q. And did you have that translated for 18 you? 19 A. That I cannot recall. 20 Q. OK. Now let's go to number 005. 21 (Exhibit 8, Defendant Wengui 22 Guo's Objections and Answers to 23 Plaintiff Logan Cheng's First Set of 24 Interrogatories marked for 25 identification, as of this date.)
20 Q. So then let's go to 008. 21 TECHNICIAN: OK. The document has 22 been marked as Exhibit 6 and is displaying 23 the document on the screen. 24 (Exhibit 6, Defendant Wengui 25 Guo's Initial Disclosures marked for		
	121	123
1 4. And the document is on the screen. 2 (Exhibit 4, Complaint and Jury 3 Demand marked for identification, as of 4 this date.) 5 Q. Mr. Guo, I will represent that this is 6 the complaint and jury demand in this case. 7 Did you have it translated for 8 you? 9 A. At the time that I had a voice 10 simultaneous interpretation of this document for 11 me, a brief interpretation, but I do not recall 12 there was translation.	1 identification, as of this date.) 2 Q. Mr. Guo, I will note these are the 3 initial disclosures filed by -- served by your 4 attorney in this case. 5 Did you ever have this document 6 translated? 7 A. The thing is that -- allow me to 8 emphasize again, like this is an English document, 9 and you know, if you ask me any of the English 10 documents just posted in front of me on the screen 11 and to scroll down and let me see, I really cannot 12 be sure that whether I have seen it or not or 13 translated the document or not. I really cannot 14 be sure. 15 Now, if you were to give me time and put 16 the document in front of me and let me really read 17 in detail and try to remember, perhaps I can. But 18 just post in front of me scrolling, I just cannot be 19 sure.	20 MR. WOLMAN: OK. Let's go to 006. I 21 know I'm jumping around Juliet, sorry. 22 TECHNICIAN: No problem at all. 23 Marking it as Exhibit 7 and 24 Exhibit 7 is on the screen. 25 (Exhibit 7, Defendant Wengui
1 Q. If you did not have the prior 2 document, which was Exhibit 4, fully translated, 3 how were you able to assist in advising your 4 company whether or not to admit or deny certain 5 facts? 6 MR. GAVENMAN: I caution you not to 7 reveal any attorney/client communications in 8 this answer. To the extent you can answer 9 without revealing them, you are free do so. 10 A. I must clarify. You know the document 11 that you showed me previously, I actually cannot 12 be sure whether there were any words of 13 translation. There may have, there may not have. 14 I just cannot be sure. 15 And including this one also. I 16 mean, that -- I may have seen it but I may not 17 have either. 18 So any of these documents in English, I 19 just wouldn't know for sure.	122	124 1 Guo's Objections and Responses to 2 Plaintiff Logan Cheng's Second Revised 3 First Set of Requests for Production of 4 Documents marked for identification, as 5 of this date.) 6 Q. This is a -- the document is a 24-page 7 document that is a your responses to our second 8 revised first set of requests for production. 9 As the technician scrolls through 10 it, you will see there are over a 100 document 11 requests, of these numbered, many of which have 12 since been omitted. 13 Do you recall seeing a translated 14 version of that, of any document with over 100 15 requests? 16 A. Yes, I recall. 17 Q. And did you have that translated for 18 you? 19 A. That I cannot recall. 20 Q. OK. Now let's go to number 005. 21 (Exhibit 8, Defendant Wengui 22 Guo's Objections and Answers to 23 Plaintiff Logan Cheng's First Set of 24 Interrogatories marked for 25 identification, as of this date.)
20 Q. So then let's go to 008. 21 TECHNICIAN: OK. The document has 22 been marked as Exhibit 6 and is displaying 23 the document on the screen. 24 (Exhibit 6, Defendant Wengui 25 Guo's Initial Disclosures marked for		

Transcript of Howan Kwok

32 (125 to 128)

Conducted on April 1, 2021

	125		127
1	Q. These are your Answers to the Revised	1	Let's not go into medical records. There
2	First Set of Interrogatories. Why don't we scroll	2	was a request for that, we objected to it
3	through that to the bottom.	3	and moved for a protective order on medical
4	Moving back to page 5, is that	4	issues. We can -- you are very on the
5	your signature?	5	boarder.
6	A. Now -- yes, this is my signature, but	6	MR. WOLMAN: That was before I found
7	I must clarify, right, I mean, I cannot recall --	7	out your client doesn't know where he was
8	I cannot be sure whether there are translation --	8	last week to sign this.
9	meaning a written translation document for me.	9	MR. GAVENMAN: OK, do you have --
10	But definitely verbal interpretation of	10	what his care is or isn't is really not
11	these documents was provided by my counsel to me.	11	relevant. He doesn't remember where it was.
12	Q. Do you understand that you signed that	12	It's really where it should begin and end.
13	under penalty of perjury?	13	Q. Are you refusing to answer the
14	A. Of course.	14	question?
15	Q. Are you certain that you understood	15	THE INTERPRETER: Counsel, I don't
16	the translations of your answers as appearing in	16	believe I finished the interpreting of that
17	this document?	17	question. Can you repeat that question for
18	A. Yes.	18	me.
19	Q. Where were you when you signed this	19	Q. Sure. Has any physician diagnosed you
20	document?	20	with a memory condition?
21	A. I cannot recall.	21	A. No.
22	Q. This was last week, correct?	22	Q. Turning back to the last exhibit which
23	A. I cannot recall.	23	24 was 00 -- which is Kwok 7, what did you do to
24	Q. Do you see the date, March 24, 2021?	24	search for responsive documents?
25	A. So it should be on, you know,	25	A. Our lawyers have made the search for
	126		128
1	March 24, right?	1	documents.
2	Q. Yes.	2	Q. Where do you store your documents?
3	A. In that case, it's March 24.	3	A. I did not store or kept any document.
4	Q. And you don't remember where you were	4	Q. Did you provide your lawyers with any
5	last week when you signed this?	5	of your phones or other computer devices?
6	A. I really don't recall.	6	A. I don't have computer.
7	Q. Earlier in this deposition, I asked	7	Q. What is the device you are currently
8	you if you had any medical conditions that would	8	using to stream this deposition?
9	prevent you from answering the questions	9	A. A cell phone.
10	accurately.	10	Q. Is that a cell phone different from
11	Do you have some sort of medical	11	the one you showed us before?
12	condition that affects your memory?	12	A. No, in front of me is actually a --
13	A. I recall that.	13	THE INTERPRETER: Counsel, do you
14	Q. Then why is it you are unable to	14	mind if I clarify the term with the witness?
15	recall where you were last week to sign this	15	MR. WOLMAN: Sure.
16	document?	16	A. So in front much me, it is a video
17	A. I don't know.	17	playing device.
18	Q. Are you currently under the care of a	18	Q. What kind of device is it?
19	neurologist?	19	A. I don't understand. Because you see
20	A. No.	20	they were in English writing -- they -- there was
21	Q. Has any physician told you you had a	21	an English writing, so I don't really know.
22	problem with your memory?	22	Q. Is it a computer?
23	MR. GAVENMAN: We are getting on the	23	A. No, it is an image video device or
24	borderline of harassing. He just doesn't	24	something called image pick-up device, something
25	remember where the document was signed.	25	like that.

Transcript of Howan Kwok

33 (129 to 132)

Conducted on April 1, 2021

	129	131
1 Q. How is it connected to the internet?	1 lawsuit in Nevada, we were full of good faith,	
2 A. Because it is a photo imaging device,	2 only asking for a very minor amount, 15,000	
3 so that it can be connected with the internet.	3 dollars. The purpose of it merely to stop him	
4 Q. Is it connected through some form of	4 attacking us, stop him spreading malicious vicious	
5 wifi?	5 rumor that has cost severe destruction to myself	
6 A. It has wifi and it has cabling wire	6 and my family.	
7 function as well.	7 And it caused great fear in my	
8 Q. And it doesn't connect -- does it	8 family's mind because imagine that they were told	
9 connect in any way to a computer?	9 that they will be deported back into China, in the	
10 A. I don't really know because it has a	10 hand -- put in the hand of the Chinese Communist	
11 box. It's called a live broadcasting box because	11 Party and put into prison by the Chinese Communist	
12 I broadcast with myself anywhere. So that's why	12 Party and then Cheng Shuiyan and his personal	
13 this is a portable device and it has a live	13 employee, Marco, came right to the Department of	
14 broadcasting box. So I don't know whether it's	14 Justice and request us to be deported. And that	
15 connecting -- can be connected with computer or	15 is the kind of fear and that kind of scary	
16 not.	16 accusation that is spread on us.	
17 Q. Where do you store your records?	17 So that is full of malicious and	
18 MR. GAVENMAN: Objection to form.	18 vicious intention, and we, in return, we were just	
19 A. Well, I don't have anywhere that I can	19 like asking for 15,000 of the damage just to stop	
20 keep any records because unlike Cheng Shuiyan,	20 him for spreading that kind of a rumor about us	
21 every day, I was trying to run away from, escape	21 and in good faith.	
22 from the persecution coming from the CCP, and I am	22 Q. One -- please, let sir, sir. What do	
23 not as wealthy as Cheng Shuiyan who has hotel and	23 you mean by "we"?	
24 who has properties, you know, and every day, I'm	24 A. I only said I. Perhaps it is the	
25 just running around. And I don't really have any	25 interpreter who interpreted it into "we," but I	
	130	132
1 place that I can keep that record.	1 only say "I."	
2 Q. When you say you're not as wealthy --	2 Q. OK. Now, are you aware that you	
3 excuse me, when you say you're not as wealthy as	3 actually asked for monies in excess of 50,000	
4 my client, how do you know that?	4 dollars on the face of the second amended	
5 MR. GAVENMAN: To the extent there is	5 complaint?	
6 any piece of this answer that regards your	6 A. Yes, I know that.	
7 assets or not assets, Mr. Kwok, on advice of	7 Q. Are you aware that you also asked for	
8 counsel, you should decline to respond to	8 punitive damages?	
9 the question and invoking your right to the	9 A. Yes, I know that. But then you see	
10 Fifth Amendment to the U.S. Constitution.	10 the thing is, in the past, right, he has -- not in	
11 To the extent, it's about	11 the past. I know that because he has caused me so	
12 Mr. Cheng's assets, you can answer.	12 much damage and he has tens of -- several tens of	
13 A. Well, you see, Cheng Shuiyan has a	13 a million dollar.	
14 hotel in Las Vegas and Lude also said that he has	14 I know that. And then he -- what	
15 other profit shares, and based on the Mongolian	15 he did cost me so much of destruction, cost me so	
16 policeman who had to interview a lot of the	16 much threat, and then cost me so much fear and	
17 people, those people have told me that Cheng	17 then full of this -- because he have made those	
18 Shuiyan has a lot of properties probably in	18 malicious, defamed accusation allegation of me,	
19 Mongolia as well.	19 calling me rapist, calling me killer, calling me	
20 So based on those information,	20 criminal, and so when I was asking him of that	
21 Cheng Shuiyan is reported to have a billion	21 punitive damage, it is really full of good faith	
22 dollars at least of the asset. Wealthy enough to	22 and he is well capable of paying it.	
23 send me to prison in China and have me deported	23 And also you see he and his	
24 into a China to be imprisoned there.	24 personal employee, Marco, wrote to the Department	
25 You see that is why in our	25 of Justice and bearing fabricated documents that	

Transcript of Howan Kwok

34 (133 to 136)

Conducted on April 1, 2021

	133	
1 stated I was wanted in the Chinese -- in China by 2 the Chinese government.	135	1 to be made responsible for his employee, his 2 personal employee, Marco, who had kept on making 3 all this allegation about me and spreading 4 malicious rumors and gossipped about me. He have 5 to be made to take that responsibility.
3 Now, I have never seen any such 4 document that stated that I am a wanted person in 5 China by the Chinese government. So where did 6 they get these government -- they fabricated this 7 document and all that is because they had the 8 purpose of deporting me into China back into the 9 hand of the Chinese government and then wanting me 10 dead. So that is malice.		6 (Simultaneous crosstalk)
11 Now, do you think that can be 12 actually paid and that is actually enough to be 13 paid for by just tens of thousands or that kind of 14 a punitive damage?		7 Q. There is no question. There is no 8 question?
15 Q. Thank you.		9 MR. GAVENMAN: We can wait until the 10 next question is pending.
16 (Simultaneous crosstalk)		11 Mr. Wolman asks a question and 12 then you can continue to respond.
17 Q. Please, there is no question. Excuse 18 me, excuse me, there is no question. Excuse me. 19 Excuse me. Excuse me. Excuse me. There was no 20 question pending.		13 Q. You mentioned a letter at Department 14 of Justice from my client. Why have you not 15 produced it?
21 (Simultaneous crosstalk)		16 A. Well, the thing is that document was 17 written by Cheng Shuiyan and his personal 18 employee, Marco, to DOJ, he, himself. They openly 19 talked about it, tweet about it online, over the 20 internet.
22 A. But I haven't finished. I haven't 23 finished my answer.		21 So it was -- it should be they 22 who need to go and get that document and provide 23 to you. That is their document. And that has 24 already been sent to DOJ. How can I get such a 25 document? How can I get it from the DOJ?
24 Well, you see the thing is, all 25 the things that he has said have been forwarded	134	136
1 and have been transmitted in mainland China and 2 forwarded to millions and tens of millions and 3 perhaps like hundreds of millions of the viewers.		1 Yet they have tweeted it and they 2 have openly talked about it on Google, online, and 3 it is constantly harassing me with that kind of a 4 statement and the damage they have caused is 5 really, you know, can't be estimated. And that is 6 why the damage has to be sought.
4 And then those messages were 5 constantly calling me Guo rapist and Guo criminal 6 and stating that the, in America, Department of 7 Justice is going to deport me back into China and 8 then calling me peasant, using words that -- as 9 filthy as anything that can be and those words and 10 those messages is going to accompany me throughout 11 life. It's never going to be erased, never able 12 to be disappeared.		7 Q. You said -- you don't have the 8 document, correct? You don't -- don't --
13 So you see, that is in return to 14 my kindness that only at the beginning, I had a 15 dinner with him, and also during that time, I was 16 very kind, I was very nice and return. Then he 17 treated me with such malice and turning white to 18 black and then calling me all kind of names. Of 19 course, I'm going to pursue him. I would never 20 give up in pursuing him with the damage.		9 (Simultaneous crosstalk)
21 (Simultaneous crosstalk)		10 MR. WOLMAN: Counsel, instruct your 11 client to wait for a question. He gives an 12 answer. I get to now ask another question. 13 This is how it works.
22 Q. Hold on, hold on, it's not responsive 23 to my question. You are filibustering again.		14 MR. GAVENMAN: Jay, you didn't follow 15 any instructions when it was your client 16 doing unbelievable things. He is giving the 17 answer, complete answers. You have to let 18 him complete the answer.
24 MR. GAVENMAN: It's not a filibuster.		19 MR. WOLMAN: He is filibustering. 20 MR. GAVENMAN: You are asking 21 questions about this document, why it wasn't 22 produced and he is giving you an answer. 23 Q. Do you have the document?
25 A. So he has to be responsible. He has		24 A. So I haven't completed my previous 25 answer, so I need to continue with my answer.

Transcript of Howan Kwok

35 (137 to 140)

Conducted on April 1, 2021

<p>137</p> <p>1 Q. Do you have the document, yes or no?</p> <p>2 MR. GAVENMAN: You need to allow him</p> <p>3 to complete his answers. That's fundamental</p> <p>4 in a deposition. He has to be able to</p> <p>5 complete his answer. You asked why not.</p> <p>6 There is a pending question. He has to be</p> <p>7 able to complete it.</p> <p>8 MR. WOLMAN: It was nonresponsive.</p> <p>9 MR. GAVENMAN: That's simply not</p> <p>10 true. He was talking about the documents</p> <p>11 and its whereabouts.</p> <p>12 MR. WOLMAN: I withdraw that previous</p> <p>13 question then.</p> <p>14 Q. My question is, do you have a copy of</p> <p>15 that document?</p> <p>16 A. I need to continue to answer my</p> <p>17 previous question.</p> <p>18 Q. No, I've withdrawn that.</p> <p>19 MR. GAVENMAN: He withdrew that</p> <p>20 question.</p> <p>21 This is pretty much the same</p> <p>22 question. You can explain why you do or</p> <p>23 do not have an answer to that question.</p> <p>24 Q. Do you have that document? There is</p> <p>25 no explanation. Yes or no. Do you have it?</p>	<p>139</p> <p>1 Did you provide your attorney</p> <p>2 with any of the documents that were used to</p> <p>3 respond to the requests for production in this</p> <p>4 case?</p> <p>5 MR. GAVENMAN: Objection to form.</p> <p>6 A. What documents?</p> <p>7 Q. Are you aware that your attorney</p> <p>8 produced documents to us in this case?</p> <p>9 A. Of course I know.</p> <p>10 Q. And do you know what those documents</p> <p>11 were?</p> <p>12 A. Of course I know.</p> <p>13 Q. Excellent. So did you give any of</p> <p>14 them to him?</p> <p>15 MR. GAVENMAN: Objection to form.</p> <p>16 A. Of course.</p> <p>17 Q. Which documents did you give to him?</p> <p>18 MR. GAVENMAN: Objection to form.</p> <p>19 THE INTERPRETER: Counsel, do you</p> <p>20 mind if I ask the witness to clarify because</p> <p>21 I can't hear clearly.</p> <p>22 MR. WOLMAN: Sure.</p> <p>23 A. The document you have seen was</p> <p>24 provided by our counsel which, in turn, provided</p> <p>25 by me to my counsel.</p>
<p>138</p> <p>1 MR. GAVENMAN: Objection to form.</p> <p>2 MR. WOLMAN: Move to strike as</p> <p>3 nonresponsive.</p> <p>4 (Simultaneous crosstalk)</p> <p>5 A. But you can't -- you can't -- you</p> <p>6 don't know what I'm answering, counsel.</p> <p>7 Q. I've been listening long enough to</p> <p>8 understand what yes and no mean in Mandarin.</p> <p>9 A. This is my right to answer your</p> <p>10 question and then I am speaking in Chinese and you</p> <p>11 don't know what I am saying. You must allow me to</p> <p>12 answer your question.</p> <p>13 Q. I hear your answer, including Marco</p> <p>14 and my client's name. I want to know do you have</p> <p>15 the letter, period.</p> <p>16 (Simultaneous crosstalk)</p> <p>17 Move to strike.</p> <p>18 A. Marco and his boss have them.</p> <p>19 Q. Do you have it?</p> <p>20 A. I don't have.</p> <p>21 Q. Have you ever had it?</p> <p>22 A. No.</p> <p>23 Q. Have you ever seen it?</p> <p>24 A. No.</p> <p>25 Q. Thank you, that was easy enough.</p>	<p>140</p> <p>1 However, however, I don't have</p> <p>2 the document that was written by Marco or Cheng</p> <p>3 Shuiyan to DOJ and that is why I want to actually</p> <p>4 ask them to get that document.</p> <p>5 Q. I'm asking about any of the documents</p> <p>6 that were produced in the response to the request</p> <p>7 for production of documents. Not your</p> <p>8 interrogatory answers.</p> <p>9 Did you provide any of them to</p> <p>10 your counsel for production?</p> <p>11 A. Yes, I provided those documents to my</p> <p>12 counsel.</p> <p>13 Q. Which ones?</p> <p>14 A. Anything that you can see were mostly</p> <p>15 provided by me.</p> <p>16 Q. Excellent.</p> <p>17 How did you get them to him?</p> <p>18 MR. GAVENMAN: Objection to form.</p> <p>19 A. Well, I handed to my lawyer. That</p> <p>20 would be it.</p> <p>21 Q. You handed them to Mr. Gavenman?</p> <p>22 A. I mean that I gave them to the lawyer</p> <p>23 in Golden Spring.</p> <p>24 Q. Where did you find these documents to</p> <p>25 give to the Golden Spring lawyer?</p>

Transcript of Howan Kwok

36 (141 to 144)

Conducted on April 1, 2021

	141		143
1 A. I don't know which document you are		1 to not reveal anything about what you heard	
2 talking about.		2 in an attorney/client communication about	
3 Q. Any of them.		3 what your attorneys were doing separately	
4 A. I cannot answer for all of them.		4 from you.	
5 There are so many of them.		5 This needs to be only things that	
6 Q. Pick one that you gave to your lawyer		6 you understand, only things that you did	
7 at Golden Spring and tell me where it came from.		7 and not things that come from	
8 A. But I don't think that as a lawyer		8 understanding about what your attorneys	
9 that you can say such a general term as any of		9 did.	
10 them. You know. I don't think this is something		10 A. My answer is that I don't recall.	
11 that the professional lawyer should say.		11 Q. Did you look for any documents to	
12 Q. I figured this time there would be an		12 respond in this case?	
13 actual answer to the question.		13 A. Of course.	
14 THE INTERPRETER: Is that a question		14 Q. And where did you look?	
15 to the witness?		15 A. I don't recall.	
16 MR. WOLMAN: Strike that.		16 Q. Where would you look if I were to	
17 Madam court reporter, could you		17 reask you those very same questions?	
18 please repeat my question.		18 MR. GAVENMAN: Objection to form.	
19 THE INTERPRETER: You mean repeat the		19 A. I don't know. I don't quite	
20 interpreting to the witness or are you		20 understand really what you mean.	
21 asking the court reporter to repeat the		21 Q. The documents you provided to respond	
22 question --		22 to -- or to look for in response to the request	
23 MR. WOLMAN: Read back the question		23 for production, just appear by magic?	
24 and then you will reinterpret.		24 MR. GAVENMAN: Again, I caution you,	
25 (Record read)		25 anything you know from your attorneys or	
	142		144
1 A. I don't understand. I don't know that		1 attorney/client communications, please don't	
2 to pick which document.		2 reveal those communications. To the extent	
3 And the thing is that you see		3 you know anything outside of that, you're	
4 there are a thousand pages of the documents and so		4 free to answer.	
5 I should know that to pick which one and to talk		5 A. Well, of course anything that is in	
6 about it, where it came from.		6 the conversation between myself and my counsel, I	
7 And also with the translation, it		7 cannot talk about here. I cannot talk about here.	
8 says any of the documents, you know. In my life,		8 But as to myself, how did I look for	
9 I never have anything that is any of the documents		9 those documents, I just don't remember. I don't	
10 such a general term. It's either right or wrong.		10 recall.	
11 Q. Where were the documents, these		11 Q. Where would you go to look for them	
12 thousands of pages that you assembled to give to		12 today if you were being asked?	
13 the lawyer at Golden Spring?		13 MR. GAVENMAN: Objection to form.	
14 A. I don't know.		14 A. OK, so you see like, for example,	
15 Q. When did you give the documents to		15 right, the communication between Marco and Cheng	
16 this lawyer?		16 Shuiyan, for example, this kind of evidence, Marco	
17 MR. GAVENMAN: Objection to form.		17 is Cheng Shuiyan's personal employee and they	
18 A. Well, in the past several years and		18 said, they claimed that they wrote to the DOJ.	
19 there are so many times, I don't know exactly		19 And to deport me. And then calling me online	
20 which specific time that you are talking about.		20 about that I was a liar and I was a rapist and so	
21 Q. In response to the second revised		21 on and so forth, and all of that, they	
22 request for production of documents propounded on		22 acknowledged and they openly treated that.	
23 you in this case, tell me what you did to search		23 So you only need to search online	
24 for documents to produce.		24 to produce that, and that's one way. And they	
25 MR. GAVENMAN: I have to caution you		25 make phone call. For example, I make phone call	

Transcript of Howan Kwok

37 (145 to 148)

Conducted on April 1, 2021

1 to the people that they have talked to in mainland 2 China. I make phone call to Lude who they had 3 talked to about that -- about what they want him 4 to do or said.	145 1 dollars from him. And that had already been very 2 clear evidence that we -- we act in good faith. And 3 of course, the only thing here is we only want to 4 tell the truth.
5 So all of that -- and then I call them 6 and got those answers, and so that is a way to 7 search for those, those information.	5 Q. Were any of the documents in this case 6 provided to you by your attorneys?
8 And also, like I said, Marco 9 later on, you know, Marco and Cheng Shuiyan, they 10 talked about all of things that they have done and 11 they tweeted it online and you search online and 12 you get all this information online and then later 13 on, that, you know, after -- at the Nevada case, 14 he disappeared, Marco disappeared. He was a 15 personal employee of Cheng Shuiyan.	7 MR. GAVENMAN: Objection, asked and 8 answered about four times. 9 MR. WOLMAN: Asked yes, answered no. 10 MR. GAVENMAN: He is answering the 11 question. It's part of the responsive 12 documents -- I don't want a speaking 13 objection, but these are -- that's his 14 answer and there is a reason that's his 15 answer.
16 So Cheng Shuiyan should be made 17 responsible for whatever he did or said anyway. 18 So all of that was actually appeared online 19 because they have many tweeters online and they 20 have tweet it out there openly. That is a way to 21 search for those information.	16 MR. WOLMAN: Did any of the documents 17 you produced come from him? 18 MR. GAVENMAN: He's clearly answered 19 that question and I'm not being deposed so 20 you can ask questions, he is answering them 21 and we can move on.
22 Q. But where would you go to find 23 documents responsive to the requests?	22 MR. WOLMAN: He is not answering. He 23 doesn't seem to remember where documents 24 were produced or what he produced or where 25 they came from. So I'm asking you.
25 A. Well, for example, when we -- when you	146 148
1 see that, for example, Cheng Shuiyan reported that 2 he have a billion of dollar of asset and he 3 purported that he is person, but for all these 4 kind of purported claim, of course I can call 5 people in China trying to ascertain his, the words 6 of his claim. So that is one way to search.	1 MR. GAVENMAN: I'm not being deposed 2 here today. So you can ask a questions -- 3 MR. WOLMAN: Actually, right now, I'm 4 engaging with you in a meet and confer 5 because I'm not sure -- 6 MR. GAVENMAN: This is not the time 7 and place for a meet and confer while he is 8 being deposed. And I know you know that. 9 It's not meet and confer time now. So 10 continue your deposition we can meet and 11 confer afterwards if you like to.
7 And then also that Cheng Shuiyan 8 and Marco, so Marco is his personal employee 9 and he need to be -- Cheng Shuiyan need to be 10 responsible for whatever Marco has said and done 11 and so he was his boss.	12 MR. WOLMAN: Well, it seems like it 13 would be useful for us to confer as to 14 whether or not he actually conducted an 15 appropriate search. And then maybe once we 16 have established that, well, he didn't 17 provide you any documents, we can go with 18 that.
12 So that need to be -- that is open 13 knowledge and that is the things that we know.	19 But if you want, we can keep going, 20 sure. But I was trying to make this easier 21 for you.
14 When we brought the case in 15 Nevada, we brought the case in good faith. The 16 proof, the evidence of that is we only claim for a 17 very small amount and we did not claim for 18 millions of dollars even though that he has -- he 19 claimed that himself, he had that billion dollars 20 of this account of assets.	22 MR. GAVENMAN: Thank you for your 23 care and concern. As always. Please 24 continue. 25 MR. WOLMAN: Not a problem.
21 But of course, when we are talking about 22 the people in China, subsequently a lot of people 23 were made disappeared and the thing is that he had 24 caused me all this destruction and all this kind of 25 a harm, we did not seek millions and millions of	

Transcript of Howan Kwok

38 (149 to 152)

Conducted on April 1, 2021

	149		151
1	THE INTERPRETER: Is there a	1	too much damage, too much of a harm that he has
2	question, counsel?	2	caused me.
3	MR. GAVENMAN: There is not.	3	For example, just a simple term,
4	Q. You said Mr. Cheng caused you a lot of	4	to him, it's only a simple word. He called me a
5	harm. How do you value that harm?	5	rapist. But the damage it caused me, how can I
6	A. Well, so it is going to be a very,	6	account for that? How can anyone just fathom the
7	very long story. You need to have some	7	damage that it is?
8	preparation. It's going to be a long story.	8	So of course I have to value it
9	Q. No, I'm asking you how you value the	9	and then calculating it. I'm in the middle of
10	10 harm.	10	doing it.
11	A. Well, you see, I am at the moment	11	Q. How was it that you came up with
12	preparing some kind of premises to how to gauge	12	12 your claim against Jonathan Ho valued at 5
13	the destruction and harm caused by Cheng Shuiyan.	13	13 million; your claim against Jianbin Yuan at 5
14	I have been calling people in Japan, Hong Kong	14	14 million; your claim against Liang for 100 million;
15	PRC, U.S. and some of the partners before.	15	15 your claim against Baotang for 1 million; your
16	You see a lot of these people at	16	16 claim against Eliang Xia for 5 million; your claim
17	the moment, they were under threat and they were	17	17 against Xianmin Xiong for 100 million?
18	not -- they did not want to, you know, be the	18	THE INTERPRETER: Counsel, I will
19	witness and tell how much threat and how much	19	probably need you to repeat those names.
20	damage, and they know that Cheng Shuiyan and	20	MR. WOLMAN: Sure.
21	Marco, his personal employee, have caused me	21	MR. GAVENMAN: I want to caution, to
22	because they were being sort of under threat and	22	the extent any of that information, any of
23	also they know from the open allegation that made	23	your understanding about why that was put in
24	by Cheng Shuiyan and his personal employee, Marco,	24	those various complaints or how the value
25	that I will be deported by the Department of	25	25 was done that came from counsel, you should
	150		152
1	Justice to mainland China and I will be deported	1	not reveal those communications.
2	to mainland China and they have made that kind of	2	To the extent that you can answer
3	allegation on Twitter, on Geteer, talking about	3	3 that without revealing attorney/client
4	that I will be deported -- not only that I will be	4	4 communications, you are free to do so.
5	deported. They keep on saying that I will be shot	5	THE INTERPRETER: Counsel, you said 5
6	to death by the Chinese government. And they keep	6	6 million, the first name is Jonathan?
7	repeating that so that cause a lot of fear by a	7	MR. WOLMAN: Jun Chen, also known as
8	lot of the people that I have worked with in the	8	8 Jonathan Ho.
9	past.	9	THE INTERPRETER: And that is one
10	So he cost me my consultant jobs	10	10 person, right?
11	and he cost me a lot of this kind of a damage and	11	MR. WOLMAN: Yes.
12	it is unaccountable and it would be these, I think	12	THE INTERPRETER: And that's 5
13	if I am gauging such kind of a value, I would say	13	13 million?
14	several tens of millions at least.	14	MR. WOLMAN: Yes.
15	Q. You said he cost you a consultant job	15	THE INTERPRETER: Then 100 million
16	16 and damages. What consultant job and what damage?	16	16 Liang, someone Liang, and 1 million,
17	A. I cannot answer them here for you.	17	17 Baotang, Baotang, 5 million Xia --
18	Q. Why not?	18	18 something.
19	A. Because at this point, I just cannot	19	MR. WOLMAN: Y-E-L-I-A-N-G, X-I-A-
20	remember them.	20	THE INTERPRETER: And then 100
21	Q. But somehow -- you can't remember jobs	21	21 million, Xiong something? The last name.
22	22 that were valued had a worth of tens of millions	22	MR. WOLMAN: 100 million was
23	23 of dollars?	23	23 X-I-A-N-M-I-N, X-I-O-N-G.
24	MR. GAVENMAN: Objection to form.	24	MR. GAVENMAN: One moment please
25	A. It's because -- it's because -- well,	25	recall my instruction about the attorney/

Transcript of Howan Kwok

39 (153 to 156)

Conducted on April 1, 2021

	153		155
1	client privilege, and secondly, secondly, to	1	Q. And did you give --
2	the extent that this implicates in any way,	2	A. Hold on, hold on, sorry.
3	anything about your personal assets or worth	3	Q. Let's take the ten-minute break,
4	or income, I advise you to take the Fifth	4	Mr. Gavenman.
5	Amendment on that portion, if it does.	5	(Recess; 4:39 p.m. to 4:56 p.m.)
6	A. Well, you know, first of all, the	6	Q. During this last break, other than
7	cases that you mentioned just now, I actually	7	your lawyer, did you talk to anybody?
8	don't remember them. And I don't really remember	8	MR. GAVENMAN: Objection to form.
9	how those amount of the damage were evaluated.	9	A. No.
10	But the thing is that I can tell	10	Q. Does anybody affiliated with Golden
11	you that they will be evaluated based on the harm	11	Spring represent you in this case?
12	that they have caused and also the facts that we	12	A. I don't know.
13	have and then also that the evaluation would be	13	Q. What do you mean you don't know?
14	conducted by my professional lawyers and -- but	14	A. Then I don't know, then I don't know.
15	one thing you can see is that you see in	15	Q. Let me try this. Other than
16	comparison, even though the damage caused by	16	Mr. Gavenman and Mr. Mitchell, does any other
17	Marco, Cheng Shuiyan's personal employee and Cheng	17	lawyer represent you relative to this case?
18	Shuiyan himself may have been more, more enormous	18	A. You mean what other people? I don't
19	than those -- the people that previously	19	quite understand.
20	mentioned, we have not asked for damage -- that	20	Q. Have you hired any other lawyers other
21	much of a damage. That has shown so many of good	21	than Mr. Gavenman and Mr. Mitchell to represent
22	faith in our part that when we brought forward	22	you in -- with respect to the claim by Mr. Cheng
23	that case.	23	against you in the U.S. District Court for the
24	And the irony, of course, is that	24	Southern District of New York?
25	we lost, and so of course because of that, we	25	A. No.
	154		156
1	understand there is -- the damage they have done	1	Q. In a court call earlier today,
2	was so great and then we have absolutely the faith	2	Mr. Gavenman referenced a criminal defense
3	that we are going to renew case and seek damage	3	attorney. Who is that criminal defense attorney?
4	because they have caused so much damage.	4	A. I don't know.
5	Q. You don't remember --	5	Q. Have you hired any criminal defense
6	(Simultaneous crosstalk)	6	attorney?
7	A. Hang on, hang on. Hang on. The wind	7	MR. GAVENMAN: Objection to form.
8	has blown open the window. I need to go close the	8	A. Well, I have no way of answering
9	window. It's just -- just because the wind is so	9	because this is actually concerning between
10	loud, I worry what it has caused disruption.	10	10 matters between myself and my counsel.
11	Q. We hear you fine.	11	Q. No, you can tell me if you have hired
12	MR. GAVENMAN: We have been going	12	12 a lawyer.
13	about two hours, can we take a bathroom	13	A. Well, we have engaged lawyers. I
14	break, in fact? We have been going another	14	14 don't know which lawyer you're talking about.
15	two-hour session here.	15	Q. Tell me all the lawyers you have
16	Q. Let me ask one question before we go,	16	currently engaged and for what purpose they
17	17 how is it that you don't remember four cases filed	17	17 represent you.
18	18 simultaneously on February 14, 2018?	18	MR. GAVENMAN: Objection to form.
19	MR. GAVENMAN: Objection to form.	19	A. But I don't recall any name. Not even
20	A. Well, I have 60 some cases in pending.	20	20 one.
21	I cannot possibly remember each of them unless I'm	21	Q. How do you know who your lawyers are?
22	God or Superman. But I really don't recall.	22	A. Well, I just know. So I recognize the
23	Q. Have you produced us the documents	23	23 face. Like for example today, Jeff appeared here,
24	24 from all 60 cases?	24	I look at him, I know that he is Jeff and then he
25	A. Well, I worked with my counsels.	25	25 is Jeff.

Transcript of Howan Kwok

40 (157 to 160)

Conducted on April 1, 2021

	157		159
1	Q. How many other lawyers have you	1 know, we have lawyers who are male, female,	
2	currently retained?	2 different races and different ethnicity. I don't	
3	A. I don't recall.	3 know why that you have to ask this question about	
4	Q. Is it more than five?	4 a race and perhaps you are full of hatred and full	
5	A. Yes.	5 of racism.	
6	Q. Is it more than ten?	6 Whatever I have, they are good	
7	A. I don't recall.	7 lawyers. There is no reason why we need to know	
8	Q. Could it be more than ten?	8 about the race or ethnicity.	
9	A. I don't know.	9 Q. You say "We have lawyers." Who did	
10	Q. So could it be more than 20?	10 you mean in the plural?	
11	A. I don't know.	11 A. I said "I." I did not say "we." It	
12	Q. Could it be a million?	12 was the interpreter who said "we." I said "I."	
13	A. Impossible.	13 Q. How do you pay these lawyers?	
14	Q. So we are somewhere between five and a	14 MR. GAVENMAN: Under the advice of	
15	15 million. Can you narrow it down any further for	15 counsel, Mr. Guo declines to respond to that	
16	16 me.	16 question invoking the protection of the	
17	A. Well, the thing is that the court is a	17 Fifth Amendment in the U.S. Constitution.	
18	serious, hallowed place. I really don't think we	18 Q. Are you paying a criminal defense	
19	should joke about that or make light of anything	19 attorney with proceeds from criminal activity?	
20	that is discussed in here.	20 MR. GAVENMAN: On advice of counsel,	
21	I never met any lawyer acted like	21 Mr. Guo declines to answer the question	
22	you. You know, you keep on asking me to guess or	22 invoking his rights under the Fifth	
23	estimate, perhaps, and so on, so forth, it's	23 Amendment of the U.S. Constitution.	
24	really ludicrous.	24 Q. A document you produced discusses a	
25	Q. Do you have an answer for my question?	25 freezing order of 8.7 billion dollars Hong Kong.	
	158		160
1	A. I don't know.	1 It discusses 510 million shares of Haitong	
2	Q. Do you currently have retained more	2 securities under the alias Kwok Howan through	
3	than a hundred lawyers?	3 three offshore companies.	
4	A. I don't know.	4 What are those three offshore	
5	Q. How is it you are able to recognize	5 companies?	
6	specifically Mr. Gavenman's face when you could	6 A. Well, my answer is no. In fact, I	
7	7 actually, when I hear it, I find that it is	8 absolutely ridiculous.	
8	have potentially a hundred other faces to	9 Q. Are you aware of the matter discussed	
9	remember?	10 at Bates number 8925 in the article you produced?	
10	A. I don't know.	11 MR. GAVENMAN: Object to form.	
11	Q. How would you be able to describe the	12 Objection to form.	
12	11 appearance of your criminal defense attorney?	13 Go ahead, if you can answer without	
13	A. I don't know.	14 looking, you can answer it.	
14	Q. Is your criminal defense attorney male	15 A. I don't really know.	
15	14 or female?	16 Q. You produced an article from the South	
16	MR. GAVENMAN: Objection to form.	17 China Morning Post from August 15, 2018, entitled,	
17	A. I don't know.	18 "Fugitive Chinese Tycoon, Guo Wengui, has U.S. 1.1	
18	Q. Is your criminal defense attorney	19 Billion Dollars of Assets Frozen by Hong Kong	
19	18 you -- strike that.	20 courts."	
20	Do you know of what ethnicity or race	21 Are you familiar with that	
21	20 your criminal defense attorney is?	22 article?	
22	A. Well, I was not able to answer your	23 A. Yes.	
23	question because, you know, we have lawyers who	24 Q. And it refers to you owning 510	
24	are female, male. I really don't know how to	25 million shares of Haitong securities through three	
25	answer your question.		
	Well -- the thing is that, you		

Transcript of Howan Kwok

41 (161 to 164)

Conducted on April 1, 2021

	161		163
1	offshore companies, a restraint order.	1	A. Yes.
2	What are the three offshore	2	Q. What is your net worth?
3	companies?	3	MR. GAVENMAN: On advice of counsel,
4	MR. GAVENMAN: Objection to form.	4	Mr. Guo declines to respond to the question
5	A. I don't know.	5	invoking his rights under the Fifth
6	Q. Have you read that restraint order?	6	Amendment of the U.S. Constitution.
7	A. Well, the thing is that so far I have	7	Q. Are you refusing to answer?
8	not read one report made by the media that is	8	A. Yes.
9	actually true about me. So I have great	9	Q. Before the last break, I referenced
10	reservation to any of the media articles. So I	10	four cases filed on February 14, 2018. Why were
11	have no comment about it, I don't know.	11	those cases all filed on the same day?
12	So -- or perhaps I should say not	12	MR. GAVENMAN: I caution you to the
13	100 percent truthful report, and also, South China	13	extent any understanding of why that
14	Morning Post was a vehicle that controlled by the	14	occurred came from attorney/client
15	Chinese Communist Party. So I really have no	15	communication, if you can answer without
16	comment to their articles.	16	revealing attorney/client privileged
17	Q. Did you ever own or -- either directly	17	information, you're free to answer.
18	or through companies you own or control, any	18	A. It is a decision made by myself and
19	shares of Haitong securities?	19	the counsel and through the discussion, so it is
20	MR. GAVENMAN: On advice of counsel,	20	privileged. I cannot answer that.
21	Mr. Guo declines to respond to the question	21	Q. Without saying what you discussed with
22	invoking his rights under the Fifth	22	your lawyers, why did you agree to have it all
23	Amendment of the U.S. Constitution.	23	filed on the same day?
24	Q. Are you refusing to answer, Mr. Guo?	24	MR. GAVENMAN: And again, to the
25	A. Yes.	25	extent your understanding was formed as part
	162		164
1	Q. Is your invocation of the Fifth	1	of an attorney/client communication or
2	Amendment with respect to Haitong securities	2	extends from an attorney/client
3	related to your invocation of the Fifth Amendment	3	communication you should not reveal that.
4	with respect to your relationship with Golden	4	To the extent you can answer
5	Spring New York?	5	without revealing attorney/client
6	MR. GAVENMAN: Objection, that's	6	communication, you're free to answer.
7	solely attorney/client privileged	7	MR. WOLMAN: Thank you for coaching
8	information understanding -- he can't answer	8	again.
9	it.	9	MR. GAVENMAN: You can't -- it's an
10	MR. WOLMAN: No, it's not?	10	attorney/client communication. You know --
11	MR. GAVENMAN: Absolutely it is. It	11	MR. WOLMAN: I already put that into
12	is.	12	the question itself.
13	You can't answer the question.	13	MR. GAVENMAN: Sorry, what was that?
14	Q. Answer the question.	14	MR. WOLMAN: I already put it into
15	MR. GAVENMAN: Jay, I'm instructing	15	the question itself. So stop coaching him
16	him not to answer on the basis of	16	16 not to respond.
17	attorney/client privilege.	17	MR. GAVENMAN: I'm not coaching. I
18	Q. Are you refusing to answer?	18	don't know how you expect him to have any
19	A. Yes.	19	understanding of why that decision was made
20	Q. Are you a billionaire?	20	20 without it, but that fine, he can answer --
21	MR. GAVENMAN: On advice of counsel,	21	MR. WOLMAN: Because we --
22	Mr. Guo declines to respond to the question	22	MR. GAVENMAN: -- without
23	invoking his rights under the Fifth	23	attorney/client communications.
24	Amendment of the U.S. Constitution.	24	MR. WOLMAN: I'm not going to hear
25	Q. Are you refusing to answer?	25	speculation, but it could well be his idea.

Transcript of Howan Kwok

42 (165 to 168)

Conducted on April 1, 2021

	165		167
1	MR. GAVENMAN: Sure, and then he can	1	suggested and I don't have to tell you that
2	answer that portion --	2	my lawyer suggested it.
3	(Simultaneous crosstalk)	3	Q. So tell me, Mr. Guo, without telling
4	MR. GAVENMAN: -- and say the	4	me about any communications you actually had with
5	attorney/client communications. And he is	5	your lawyers, why did you decide to pull the
6	free to do that.	6	trigger and have four cases filed on the same day?
7	(Simultaneous crosstalk)	7	MR. GAVENMAN: Again, to the extent
8	MR. WOLMAN: He doesn't have to	8	this answer would reveal any amount of any
9	reveal attorney/client communications.	9	legal strategy between you and your counsel,
10	MR. GAVENMAN: Don't reveal anything	10	you cannot talk about that portion.
11	that came from an attorney/client	11	MR. WOLMAN: That is not correct. He
12	communications, any understanding you had	12	can reveal --
13	that came from it. --	13	MR. GAVENMAN: That's my instruction
14	MR. WOLMAN: Not understanding, not	14	to my client. It's a question for the
15	an understanding.	15	judge.
16	He can still tell me why he	16	MR. WOLMAN: That's obstruction. You
17	wanted to do something without telling	17	need to learn about privilege, Jeff. That's
18	me what was discussed. Because he could	18	not how it works.
19	think, oh, it's a great idea to do what	19	MR. GAVENMAN: Jay, very good, thank
20	my lawyer told me without telling me	20	you for your help in being so wonderful as
21	that his lawyer told him that.	21	always.
22	MR. GAVENMAN: And I said exactly	22	Please move on. He can't answer
23	along those lines.	23	that question if it is about
24	MR. WOLMAN: No, you didn't.	24	attorney/client privileged information
25	MR. GAVENMAN: If you answer the	25	and strategy that came from his
	166		168
1	question --	1	attorney.
2	(Simultaneous crosstalk)	2	If he said he can answer it
3	MR. GAVENMAN: You asked why you	3	separately, he is free to do so.
4	thought it would be a good idea -- I'm	4	Q. Answer the question.
5	assuming there, some of that portion, at	5	A. Well, there is no other reason really.
6	least some of that answer is wrapped up in	6	6 It's just that we have looked at all the cases,
7	attorney/client privilege.	7	7 consolidate, in a consolidated manner, we look at
8	If it's not, to the extent it's	8	8 all of that, and then the counsel recommended
9	not, he is free to answer it.	9	9 that, you know, that to put those four cases on
10	To the extent it came from	10	10 the same day and that is all.
11	attorney discussions about what certain	11	Q. I'm a little confused because these
12	things would happen, why certain things	12	were filed, two in New York, one in New Jersey,
13	would happen certain ways, those are	13	and one in Virginia.
14	privileged communication that he can't	14	How is this all one counsel
15	reveal.	15	having the idea to put them all in the same day?
16	MR. WOLMAN: He can still say I	16	A. I don't know.
17	decided to do something because of "X" even	17	Q. Do you know when cases are filed on
18	if it was an idea his attorney told him.	18	your behalf?
19	MR. GAVENMAN: Well, if it was a	19	A. Of course.
20	privileged communication and privileged	20	Well, I'm actually quite curious,
21	understanding --	21	21 counsel, why are you banging on this question
22	MR. WOLMAN: I'm not asking him --	22	22 about one day filing cases for one day. I mean,
23	privileged goes to communications between	23	23 it's such a strange and curious question.
24	you and your lawyer. Privilege does not go	24	Why can't the cases be filed on
25	I decided to do something that my lawyer	25	one day? Is that illegal? Is that something that

Transcript of Howan Kwok

43 (169 to 172)

Conducted on April 1, 2021

	169		171
1 is wrong?		1 Q. Do you recall answering	
2 It's really if I recall that correctly,		2 interrogatories in that case?	
3 this is the first time I ever heard of this		3 A. You mean what response -- what	
4 question.		4 interrogatory to what case?	
5 In fact, what I am saying, I		5 Q. Do you recall responding to written	
6 actually don't remember these four cases were		6 questions in that case?	
7 filed in one single day. And so that, you know,		7 A. I don't remember all of it.	
8 if it were not you who keep on asking about this		8 Q. In response to interrogatory number 1	
9 question about these four cases all filed on the		9 in it, it says, quote, I will represent that this	
10 same day, I would not have known there was such		10 is at Bates quote 3733, "Plaintiff responds that	
11 four cases and they were all filed on the same		11 he is an entrepreneur without a salary or income."	
12 day. I really had no idea.		12 Is that statement accurate?	
13 Q. What is your relationship with Eastern		13 MR. GAVENMAN: On advice of counsel,	
14 Profit Corporation Limited?		14 Mr. Guo declines to respond to the question	
15 MR. GAVENMAN: On advice of counsel,		15 invoking his rights under the Fifth	
16 Mr. Guo declines to respond to the question		16 Amendment of the U.S. Constitution.	
17 invoking his rights under the Fifth		17 Q. Are you refusing to answer that	
18 Amendment of the U.S. Constitution.		18 question?	
19 MR. WOLMAN: He filed a lawsuit		19 A. Yes.	
20 against Strategic Vision in which he		20 Q. Was that statement accurate on the	
21 acknowledged that he was principle of		21 date it was made and filed being November 18,	
22 that --		22 2019?	
23 MR. GAVENMAN: I understand.		23 MR. GAVENMAN: On advice of counsel,	
24 MR. WOLMAN: -- in the Southern		24 Mr. Guo declines to respond to the question	
25 District of New York.		25 invoking his rights under the Fifth	
	170		172
1 MR. GAVENMAN: I understand.		1 Amendment of the U.S. Constitution.	
2 Q. Are you refusing to answer?		2 Q. Are you refusing to answer?	
3 THE INTERPRETER: I haven't		3 A. Yes.	
4 interpreted.		4 Q. Did you reach a settlement in the case	
5 MR. WOLMAN: Thank you.		5 with Mr. Xianmin Xiong?	
6 A. Yes.		6 A. Well, first of all, I must tell you	
7 How is our timing? I have		7 that the pronunciation of that name was wrong,	
8 other obligations.		8 right?	
9 MR. WOLMAN: I think I still have at		9 And the thing is I can say that	
10 least another hour.		10 even to this date, that case was not entirely	
11 MR. GAVENMAN: Fifty-nine minutes.		11 settled.	
12 Q. You provided to us in your discovery		12 Q. Are you aware that a stipulation of	
13 responses your responses and objections to		13 discontinuance was filed on September 15, 2020?	
14 interrogatories in a lawsuit against by you		14 A. Well, that's only one of the cases and	
15 against Xianmin Xiong, X-I-A-N-M-I-N, X-I-O-N-G.		15 there are other cases that were in connection with	
16 Do you recall answering		16 Xianmin Xiong as well.	
17 interrogatories in that matter?		17 Q. That case was dismissed with	
18 A. I actually don't know this person,		18 prejudice, correct?	
19 Xianmin Xiong, or perhaps it is the interpreter		19 A. That is not true.	
20 did not interpret the name right.		20 Q. Are you saying that the document filed	
21 Q. Also known as X-I, N-U-O, also known		21 on New York State's court electronic system is	
22 as Frank, also known as Xino, also known as		22 incorrect?	
23 X-I-N-O.		23 MR. GAVENMAN: Objection to form.	
24 A. So the name is Xiong Xianmin, I know,		24 A. Well, perhaps the document was not	
25 I know this case.		25 wrong, but then there are so many other cases that	

Transcript of Howan Kwok

44 (173 to 176)

Conducted on April 1, 2021

	173		175
1 were -- that has some connection with Xiong		1 system for New York's courts between you and	
2 Xianmin as well.		2 Xianmin Xiong other than the one that was	
3 Q. Did Xiong Xianmin or however you		3 dismissed by a stipulation?	
4 pronounce that or anyone on his behalf make any		4 A. I don't know.	
5 payment in exchange for that case being		5 Q. Who is Yanping Wang a/k/a Yvette Wang?	
6 discontinued with prejudice?		6 A. She is from Golden Spring.	
7 A. No.		7 Q. And what is her job at Golden Spring?	
8 Q. Why would you have it discontinued		8 A. So she is the president.	
9 with prejudice without any payment?		9 Q. Do you know anything about her lawsuit	
10 MR. GAVENMAN: To the extent you can		10 against Xianmin Xiong?	
11 answer that without revealing any legal		11 A. Yes.	
12 strategy communicated between you and your		12 Q. What your role with respect to that	
13 counsel, you're free to answer.		13 lawsuit, if any?	
14 A. Well, that was the strategy that I had		14 A. No.	
15 together with my counsel.		15 Q. Have you spoken with Ms. Wang	
16 Q. You sued that gentleman for 100		16 regarding this lawsuit?	
17 million dollars. Do you not recall that?		17 A. No.	
18 A. Yes.		18 Q. I want to make sure I understand.	
19 Q. How did it benefit you to dismiss that		19 You have -- are you -- Yanping Wang,	
20 case without getting a dime in recovery?		20 also known as Yvette Wang, is the president of	
21 MR. GAVENMAN: Objection to form.		21 Golden Spring that is financing your defense in	
22 Objection to form and same caution.		22 this case and has otherwise paid the judgments to	
23 A. Well, that is actually a strategy that		23 my client, but you have never discussed this case	
24 we have arrived between myself and my counsel.		24 with her, correct?	
25 Q. I understand. I don't need to know if		25 MR. GAVENMAN: Object to form.	
	174		176
1 a lawyer told you. I need to know how it		1 A. Yes.	
2 benefited you.		2 Q. Does Golden Spring New York Limited	
3 MR. GAVENMAN: Same caution.		3 have a treasurer?	
4 A. Well, the whole matter has not been		4 A. Of course there is.	
5 concluded.		5 Q. Have you discussed this case with that	
6 Q. What part of it is still ongoing since		6 treasurer?	
7 it was dismissed with prejudice?		7 A. No.	
8 A. Well, I cannot just -- I cannot tell		8 Q. What is the name of the treasurer of	
9 you because that is the strategy that I and my		9 Golden Spring Limited?	
10 counsel arrived at.		10 A. I don't know.	
11 Q. Is that counsel Mr. Steinberg?		11 Q. Other than Ms. Wang, who can you	
12 A. One of them.		12 identify as being an officer of Golden Spring?	
13 Q. Have you filed any other lawsuits		13 A. I don't know.	
14 against Xianmin Xiong or however you pronounce it?		14 Q. How did Golden Spring know to pay the	
15 A. Yes.		15 judgment against you by Mr. Cheng in the Nevada	
16 Q. Where? In what court?		16 case?	
17 A. New York.		17 A. Well, lawyers communication.	
18 Q. Have you produced a copy of that		18 Q. Do you know the person -- who the	
19 complaint?		19 person was at Golden Spring who initiated the wire	
20 A. I don't recall.		20 transfers to our firm?	
21 Q. When did you file this new case		21 A. I don't know.	
22 against Xianmin Xiong?		22 Q. Do you know who is authorized at	
23 A. I don't recall.		23 Golden Spring to initiate wire transfers of funds?	
24 Q. Do you know if there is any reason why		24 A. I don't know.	
25 there is no case currently on the electronic		25 Q. You produced to us some text messages	

Transcript of Howan Kwok

45 (177 to 180)

Conducted on April 1, 2021

	177		179
1		1	A. I don't know.
2		2	Q. How would you find out?
3		3	A. I don't know.
4		4	Q. Are you aware that that case closed in
5		5	April of 2020?
6		6	A. I cannot recall specifically.
7		7	Q. Are your attorneys in Virginia holding
8		8	money on your behalf?
9		9	A. I don't recall.
10		10	Q. On April 3, 2020, Judge Ellis
11		11	ordered -- strike that.
12		12	He noted that the check of 12,000
13		13	dollars from the court registry was mailed to you
14		14	on March 23, 2020. Is Judge Ellis incorrect?
15		15	A. Well, I don't -- I didn't say that he
16		16	is wrong. I just don't recall.
17		17	Q. Do you know what happened to that
18		18	12,000 dollars?
19		19	A. I don't know.
20		20	Q. Are you able to find out from your
21		21	attorneys in that case?
22		22	A. Well, I think -- you see today, I come
23		23	here to answer the deposition made for the case of
24		24	Cheng Shuiyan. I'm not here for you to teach me
25		25	how to communicate with attorneys handling other
	178		180
1	Q. Which lawyers did you give them?	1	cases for me, and I feel like 90 percent of the
2	A. Well, I just gave them to the lawyer.	2	time that you are wasting in matters that are
3	Q. To Mr. Gavenman?	3	irrelevant to the case and to me, that is a form
4	A. I handed them to Daniel, I believe.	4	of abuse, a form of torture and you are very well
5	Q. And is Daniel the same individual we	5	aware of that.
6	were discussing earlier who notarized on the	6	Q. I actually found my answer even though
7	verification.	7	you were nonresponsive. It says on an order from
8	A. Yes.	8	March 9, 2020 that the court sent you a check by
9	Q. Are you aware of a lawsuit you filed	9	registered mail cable to you, Wengui Guo, a/k/a
10	in the Eastern District of Virginia against	10	10 Miles Kwok, 781 Fifth Avenue, 18th Floor, New
11	someone named Baosheng Guo, B-A-O-S-H-E-N-G?	11	York, New York, 10022.
12	A. Yes.	12	Did you receive that check from
13	Q. Is there a reason you didn't produce	13	registered mail?
14	to us the documents in connection with that case?	14	A. I don't recall.
15	A. I don't know.	15	Q. You testified earlier that the folks
16	Q. According to the docket in that case,	16	at Golden Spring are the ones who get your mail.
17	12,000 dollar payment is made to you as a	17	Did they ever tell you about a check for 12,000
18	prevailing party. Are you aware of that?	18	dollars coming in?
19	A. Yes.	19	MR. GAVENMAN: Objection to form.
20	Q. How did that 12,000 dollars get into	20	Objection to form.
21	your hands?	21	A. I don't recall.
22	A. Well, I don't believe that I have	22	Q. Did you ever negotiate, meaning
23	received that 12,000 dollars as yet.	23	endorse, sign over, deposit a 12,000 dollar check
24	Q. Do you know if that payment was	24	from the U.S. District Court for the Eastern
25	actually made?	25	District of Virginia payable to you?

Transcript of Howan Kwok

46 (181 to 184)

Conducted on April 1, 2021

	181	
1 A. I don't recall.		183
2 Q. Is anybody, other than you, authorized		1 Q. I'm asking you, do you want to change
3 to deposit checks made payable to you?		2 any of your answers?
4 A. I don't know.		3 A. OK, so the changes that you see, all
5 Q. Have you filed income tax returns for		4 of these things that I just mentioned about,
6 calendar year 2020?		5 right, and it's actually -- I remember when I
7 A. Of course.		6 answer you, I said that is May, but it actually
8 Q. Did you include this 12,000 dollar		7 started all in March, 2018, all the way through to
9 payment for judgment as income in that tax return?		8 August, and then I sue him in September of 2018.
10 MR. GAVENMAN: On advice of counsel,		9 So that would be the change I would like to make.
11 Mr. Guo declines to answer the question		10 Q. Moving back to your lawsuit with
12 invoking his rights under the Fifth		11 Baosheng in Virginia, paragraph 107 of the
13 Amendment of the U.S. Constitution.		12 complaint in that matter states, "Guo acted on
14 Q. Are you refusing to answer?		13 these false representations and relied on them
15 A. Yes.		14 when he gave Baosheng 42,000 dollars in total."
16 Q. Are there any answers you've given		15 My question to you is, what was the
17 today -- now that you have had a day to think		16 source of the 42,000 dollars?
18 about it that you wish to change?		17 MR. WOLMAN: And before you make your
19 A. Yes.		18 speaking objection --
20 Q. And what is that?		19 MR. GAVENMAN: No, it's on advice of
21 A. Well, you see for the matter of Marco		20 counsel to respond to question --
22 and his employee relationship with Cheng Shuiyan		21 MR. WOLMAN: I want to make sure --
23 and they have sent out tweet messages, online		22 this case, this case went to trial, so I'm
24 messages, and for the time they send the message		23 asking -- so he obviously put forth evidence
25 and the content of the message and also the		24 of that payment to Baosheng. So my question
	182	25 is -- that's already now out in the public
1 relationship -- and also that the message is sent		184
2 between them to Wang Ding Gang via WhatsApp and		1 and public record. So my question here is
3 also just the matter that the personnel from		2 what was the source of that money?
4 Beijing visiting Cheng Shuiyan and gifting him		3 MR. GAVENMAN: Mr. Guo declines to
5 millions of U.S. dollars and so as to start his		4 testify about that matter here today,
6 changing of the -- the turn of the event with me,		5 invoking his rights under the Fifth
7 all these matters, I should start from the		6 Amendment of the U.S. Constitution.
8 beginning to tell you that.		7 Q. Are you refusing to answer?
9 And also the contents involving		8 THE INTERPRETER: Counsel, let me
10 Cheng Shuiyan of defaming me on Twitter, this		9 interpret everything that just happened.
11 platform, concerning about my family and calling		10 A. Yes.
12 me rapist and calling me a hooligan, calling me		11 Q. Did you testify at a trial in that
13 low class, a peasant, and not even -- low class		12 case?
14 peasant and talking about me having a big deal		13 A. Yes.
15 with Xi Jinping, all of that, I would also like to		14 Q. Did you testify that you paid Baosheng
16 start to tell you that.		15 Guo 42,000 dollars?
17 And also that I would like to		16 A. Well, Baosheng Guo was 2011 the
18 tell you about the matter that Cheng Shuiyan		17 partner of Cheng Shuiyan in this whole business of
19 talking about on Twitter in relation to writing to		18 attacking me and the fact that he is one of the
20 the ministry -- minister of or department head of		19 persons who attacked me together with Cheng
21 DOJ and claiming that he is to -- they are going		20 Shuiyan the most.
22 to deport me to China and telling that I was a		21 MR. WOLMAN: I'm asking the court
23 criminal and I was a wanted person, all these		22 reporter, move to strike as nonresponsive.
24 matters, I would like to actually tell you about		23 Q. Did you testify that you paid, you
25 that.		24 paid Baosheng Guo 42,000 dollars?
		25 A. I don't recall.

Transcript of Howan Kwok

47 (185 to 188)

Conducted on April 1, 2021

	185		187
1	Q. Did you write a check to Baosheng Guo	1	MR. WOLMAN: I'm going to -- I'm
2	for the various amounts he requested?	2	going to suspend the deposition at this
3	A. I don't recall.	3	point pending the issues regarding the
4	Q. How did money go from you to the --	4	claims of Fifth Amendment privilege.
5	how did 42,000 dollars go from you to Baosheng	5	THE WITNESS: Thank you very much.
6	Guo?	6	(Time noted: 6:16 p.m.)
7	MR. GAVENMAN: On advice of counsel,	7	
8	Mr. Guo declines to respond to the question	8	HOWAN KWOK
9	invoking his rights under the Fifth	9	
10	Amendment of the U.S. Constitution.	10	Subscribed and sworn to
11	Q. Are you refusing to answer?	11	before me this day
12	A. Yes.	12	of MO , 2021.
13	Q. From whatever account or accounts that	13	
14	you used to pay Baosheng Guo, how much money is in	14	
15	them now?	15	
16	MR. GAVENMAN: On advice of Mr. Guo's	16	
17	counsel, Mr. Guo declines to respond to the	17	
18	question invoking his rights under the Fifth	18	
19	Amendment of the U.S. Constitution.	19	
20	Q. Do you have any records of the	20	
21	payments to Mr. Guo, Baosheng Guo?	21	
22	A. I don't recall.	22	
23	Q. Who would have records -- strike that.	23	
24	Were records of those payments	24	
25	introduced as evidence in the trial between you	25	
	186		188
1	and Baosheng Guo?	1	INDEX:
2	A. Yes.	2	WITNESS EXAM BY: PAGE:
3	Q. Do you have control over those	3	H. Kwok Mr. Wolman 6
4	exhibits?	4	
5	MR. GAVENMAN: Objection, objection	5	EXHIBIT INDEX:
6	to form.	6	NUMBER DESCRIPTION PAGE:
7	A. I am not quite sure I understand what	7	Exhibit 1 Amended Notice of Deposition 20
8	you mean.	8	Exhibit 2 Defendant Wengui Guo's 23
9	Q. Do you or your attorneys have copies	9	Verified Statement Pursuant to
10	of the exhibits introduced at the trial between	10	Local Civil Rule 26.1
11	you and Baosheng Guo?	11	Exhibit 3 document entitled "Complaint" 107
12	A. I actually don't quite understand what	12	Exhibit 4 Complaint and Jury Demand 122
13	you -- what your question means. I don't	13	Exhibit 5 Defendant Wengui Guo's Answer 122
14	understand.	14	to the Complaint
15	Q. What is Broadcasting Board of	15	Exhibit 6 Defendant Wengui Guo's Initial 123
16	Governors?	16	Disclosures
17	THE INTERPRETER: Counsel, is that a	17	Exhibit 7 Defendant Wengui Guo's 125
18	company or is that --	18	Objections and Responses to
19	MR. WOLMAN: A company.	19	Plaintiff Logan Cheng's Second
20	THE INTERPRETER: It is a company?	20	Revised First Set of Requests
21	MR. WOLMAN: An entity. Yes.	21	for Production of Documents
22	A. I cannot understand exactly what this	22	
23	means. I don't understand this question at all.	23	
24	THE INTERPRETER: Did we have any	24	
25	questions?	25	

Transcript of Howan Kwok

48 (189 to 192)

Conducted on April 1, 2021

189

1 EXHIBIT INDEX:

2 NUMBER	DESCRIPTION	PAGE:
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1 CERTIFICATE

2 STATE OF NEW JERSEY)

3)ss:

4 COUNTY OF UNION)

5 I, MARY F. BOWMAN, a Registered
 6 Professional Reporter, Certified
 7 Realtime Reporter, and Notary Public
 8 within and for the States of New York
 and New Jersey, do hereby certify:

9 That HOWAN KWOK, the witness
 10 whose deposition is hereinbefore set
 11 forth, was duly sworn by me and that
 12 such deposition is a true record of the
 13 testimony given by such witness.

14 I further certify that I am not
 15 related to any of the parties to this
 16 action by blood or marriage and that I
 17 am in no way interested in the outcome
 of this matter.

18 In witness whereof, I have
 19 hereunto set my hand this 2nd day of
 20 April, 2021.



23 MARY F. BOWMAN, RPR, CRR

24

25

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